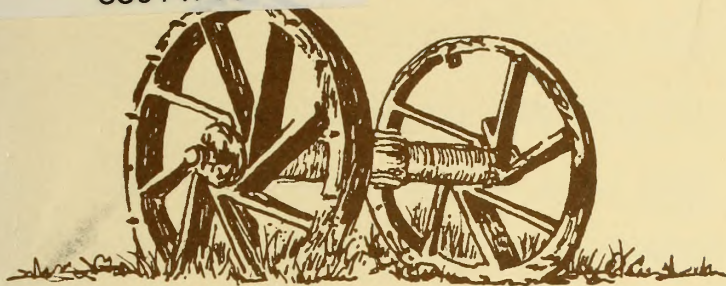


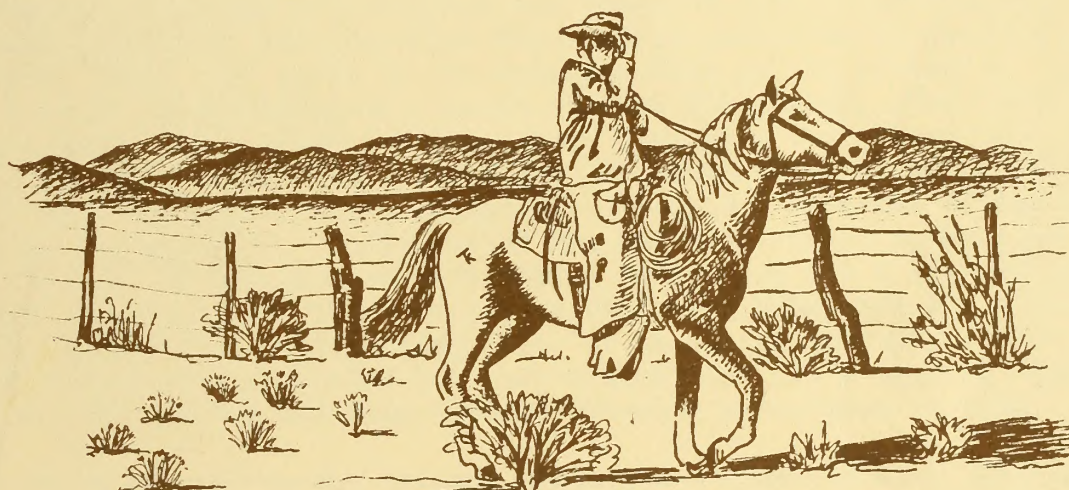


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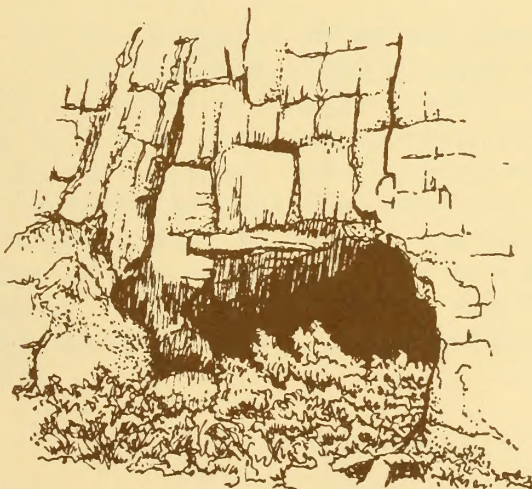
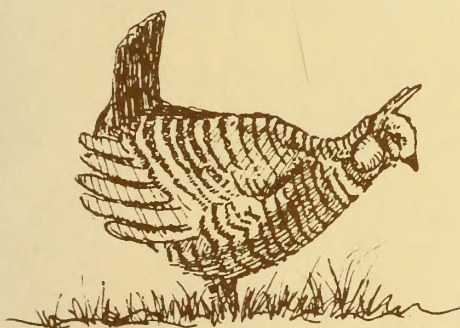


# CARLSBAD RESOURCE AREA

## RESOURCE MANAGEMENT PLAN ENVIRONMENTAL IMPACT STATEMENT



### FINAL



US DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
ROSWELL DISTRICT OFFICE  
NEW MEXICO

SEPTEMBER 1986

BLM-NM-PT-86-014-4410



## N O T I C E

THIS IS THE FINAL RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT (RMP/EIS) FOR THE CARLSBAD RESOURCE AREA. THIS FINAL RMP/EIS INCORPORATES THE DRAFT RMP/EIS BY REFERENCE AND INCLUDES A SUMMARY OF THE DRAFT, CHANGES TO THE DRAFT RESULTING FROM PUBLIC REVIEW AND COMMENT, A RECORD OF PUBLIC COMMENT ON THE DRAFT, THE RESPONSES TO THOSE COMMENTS, AND THE PROPOSED PLAN. COPIES OF THE DRAFT RMP/EIS ARE AVAILABLE FROM THE BLM ROSWELL DISTRICT OFFICE, FEATHERSTONE BUILDING, 1717 WEST 2ND, ROSWELL, NM, 88201, AND THE CARLSBAD RESOURCE AREA OFFICE, 101 EAST MERMOD, CARLSBAD, NM, 88220.





# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

Carlsbad Resource Area Headquarters

P. O. Box 1778

Carlsbad, New Mexico 88220

Dear Reader:

Enclosed for your review is the Proposed Carlsbad Resource Management Plan (RMP)/Final Environmental Impact Statement (EIS). This document analyzes the impacts of managing the public land in the Carlsbad Resource Area in all of Eddy and Lea Counties and southwest Chaves County, New Mexico.

This Proposed RMP/Final EIS contains the Proposed Plan. The Proposed Plan is a modified version of the Preferred Alternative published in the Draft RMP/EIS in February 1986. All parts of the Proposed Plan may be protested. Protests should be sent to the Director, Bureau of Land Management, 18th and C Streets NW, Washington, D.C., 20240, within thirty days from the filing date of the Proposed RMP/Final EIS. The protest should include the following information: (1) the name, mailing address, telephone number, and interest of the person filing the protest; (2) a statement of the issue or issues being protested; (3) a statement of the part or parts being protested; (4) a copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party or an indication of the date the issue or issues were discussed for the records; and (5) a concise statement explaining why the BLM New Mexico State Director's decision is wrong.

At the end of the thirty-day protest period, the Proposed Plan, excluding any portions under protest, will become final. Approval will be withheld on any portion of the Plan under protest until final action has been completed on such protest. The approval process and the approved Plan will be published with the Record of Decision.

This Proposed RMP/Final EIS was prepared using the comments received through the review process on the Draft RMP/EIS. The changes suggested through the public review process did not require a major rewrite of the Draft and substantial cost savings have been realized by reprinting only the responses to comments, additions and corrections, and the proposed plan. Therefore, the Draft RMP/EIS has been incorporated into this Proposed RMP/Final EIS by reference. Thus, this document must be used in conjunction with the Draft RMP/EIS. A limited number of copies of the Draft are still available from the BLM, Carlsbad Resource Area, 101 E. Mermod, P. O. Box 1778, Carlsbad, NM, 88220, and at the Roswell District Office, Featherstone Building, 1717 W. 2nd street, Roswell, NM, 88201.

Sincerely,

Charles S. Dahlen  
Area Manager







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CARLSBAD  
RESOURCE MANAGEMENT PLAN  
AND  
ENVIRONMENTAL IMPACT STATEMENT

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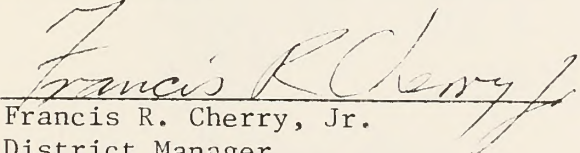
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The United States Department of the Interior, Bureau of Land Management

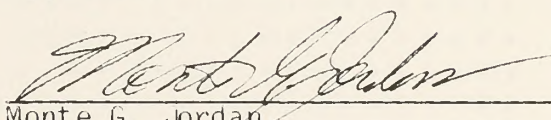
1. Type of Action: Administrative (X) Legislative ( )
2. Abstract: This Proposed Resource Management Plan and Final Environmental Impact Statement describes and analyzes the Proposed Carlsbad Resource Management Plan for managing the public lands and resources in the Carlsbad Resource Area, New Mexico. The Proposed Plan is the Balanced Use Alternative (Alternative C) from the Draft, slightly modified.
3. For further information, contact:

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Bureau of Land Management **BLM LIBRARY**  
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Recommended:

  
Francis R. Cherry, Jr.  
District Manager  
Roswell District Office  
Roswell, New Mexico

Approved:

  
Monte G. Jordan  
Acting State Director  
New Mexico State Office

Date filed with Environmental Protection Agency:

Date by which comments are due:

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## SUMMARY Additions and Corrections to the Draft

Page S-3, column 2, under Wildlife Habitat, paragraph 3, line 2. Move second sentence to page S-4, column 1, and insert as first sentence under Threatened or Endangered Species.

Page S-4, column 1, under SPECIAL MANAGEMENT AREAS, paragraph 2, line 1. Delete "existing" and insert "designated or proposed."

Page S-7, column 2, under Off-Road Vehicles, line 3. Change "3,999 acres" to "3,996 acres."

Page S-8, column 1, under Cave Resources, line 4. Insert "leasable" between "solid" and "minerals."

Page S-10, column 1, under Soil and Water, first sentence. Change sentence to read, "Loss of soil productivity, increasing erosion, and sedimentation, caused predominantly by mineral development, would continue over most of the CRA."

Page S-10, column 1, under Soil and Water, line 6. Delete "special" and insert "restricting," and delete "stipulations" and add "and mineral activities."

Page S-10, column 1, under Livestock Grazing, paragraph 1. Change "49" to "50" and "413,000" to "420,000."

Page S-11, column 2, under Cave Resources, line 5. After "features" add "found within the cave resource primary occurrence zone."

Page S-15, column 1, under Off-Road Vehicles, line 6. Change "303,993 acres" to "3,916 acres."

Page S-17, column 2, under SPECIAL MANAGEMENT AREAS ISSUE. Insert sentence "There would be the same 23 SMA's covering the same acreage as under Alternative D."

Page S-17, column 2, after sentence 1, above. Insert the heading "AREAS OF CRITICAL ENVIRONMENTAL CONCERN," and the sentence "ACEC designations would be the same as under Alternative D."

Page S-17, column 2, after Cave Resources entry. Insert the subheading "Off-Road Vehicles," and the sentence, "There would be the same ORV designations as under Alternative D."





## SUMMARY OF THE PROPOSED PLAN

The Proposed Plan consists of Alternative C of the Draft RMP/EIS with certain modifications. Chapter 2 of this Final RMP/EIS describes the proposed plan in detail while Chapter 4 discusses impacts of the plan. This section summarizes these two chapters.

### LAND TENURE

There are 220,700 acres of public lands proposed for disposal. Priority disposals would be in east Lea County; southwest Chaves County; and the Hart Canyon, Lower Black River, and the Hope areas of Eddy County. Land exchange is the Bureau's preferred disposal method. Approximately 1,950,300 acres would be retained under BLM administration. In addition, BLM will attempt to acquire 1,080 acres of private land and 2,090 acres of State land to protect important resource values.

Because disposal through exchange will be emphasized, the net acreage of Federal ownership should not change significantly and impacts should be insignificant. Land acquisitions will improve public access, improve resource values of affected public land tracts, and eliminate much of the potential for conflicting uses.

### MINERAL AND ENERGY RESOURCES

#### Oil and Gas Leasing

Federal mineral estate open for oil and gas development under standard terms and conditions would total 2,117,932 acres. An additional 601,068 acres will be open under special stipulations, generally conforming to Special Management Area (SMA) prescriptions. Of the total acreage with special stipulations, 43,417 acres would have a No Surface Occupancy (NSO) stipulation. Geophysical operations will comply with ORV designations to ensure protection of sensitive or fragile resources.

Oil and gas development will not be affected on most public land. Mineral estate totaling 601,068 acres will be subject to a

number of special stipulations which will add to the cost of drilling operations. The most serious impacts will be on high potential mineral estate within the 43,417 acres under NSO stipulations. Although much of this area can be reached through directional drilling, production on those shallow oil tracts over 40 acres in size or more than 1,000 feet in total width could be seriously affected.

#### Leasable Solid Minerals

Potash leasing within the potash enclave will continue under standard stipulations. Potash prospecting outside the enclave will not be allowed on 41,956 acres. Other solid mineral leasing will be closed on 48,296 acres leaving 2,670,704 acres open to leasing and development under standard conditions or with special relatively minor stipulations.

The proposed plan will not significantly affect solid minerals leasing and development.

#### Mineral Materials

Caliche, sand, gravel, building stone, and other salable minerals will continue to be available on 2,657,629 acres of public lands. An additional 61,371 acres would be closed to mineral material disposal within SMAs and current withdrawals.

Because caliche, sand, gravel, and quarry rock are abundant throughout the Resource Area, no significant impacts are anticipated from closures or other constraints in proposed SMAs.

#### Locatable Minerals

All public land and mineral estate will be open to mineral entry and development except for the existing 15,529 acres of withdrawals and the additional 11,759 acres of proposed withdrawals.

Impacts to locatable minerals will be minimal due to the small withdrawal acreage involved and the absence of valuable mineral deposits within those areas.



## RANGELAND RESOURCES

### Soil, Water, and Air

Soil, water, and air resources will continue to be evaluated on a project basis through the EA process. Soils will be managed to maintain productivity and to minimize erosion. Watershed activity plans will be developed and will include watershed treatments such as reseedling or erosion and flood control structures. Flood hazards will be evaluated in planning for facilities, land disposals, and other proposals, to reduce the risks of flood loss.

Long term site specific loss of soil productivity, increasing erosion, and sedimentation will continue due to mineral activity. However, impacts within most areas with fragile or erodible soils and sensitive water will be minimized due to protective stipulations within SMAs and improved livestock grazing and watershed practices.

### Vegetation

Approximately 62,000 acres west of the Pecos River are proposed for vegetation treatment. Less than five percent of the acreage would be treated chemically while the remainder would be treated by prescribed burning.

In the long term, the overall types and productivity of forage species produced on public lands will improve. Rangeland improvement projects will lessen some of the adverse impacts to vegetation from other development.

### Livestock Grazing

The 12 existing Allotment Management Plans (AMPs) would be fully implemented and maintained. An additional 50 Cooperative Management Plans (CMPs) would be developed and implemented. Total acres covered by AMPs and CMPs would be 420,000 acres and approximately \$900,000 would be spent on rangeland improvement.

An initial reduction of 24,859 AUMs would be implemented on all allotments. Short-term

impacts to livestock grazing would be mitigated by the nonuse that has typically occurred.

In the long term, livestock grazing would increase from 192,000 AUMs to 225,458 AUMs and livestock operators would realize significant increases in production.

### Wildlife Habitat

Habitat Management Plans (HMPs) would be implemented for mule deer on approximately 125,000 acres and pronghorn antelope on 114,500 acres. Management would include water development, fence modifications, and prescribed burning. Game bird habitat quality would be improved by an HMP covering 96,000 acres.

All riparian standard habitat sites (approximately 54,500 acres) would be intensively managed to enhance water and vegetative quality.

Eleven Special Management Areas will be managed to protect wildlife habitat. These SMAs, totalling 140,504 acres, include four Research Natural Areas (4,420 acres) and five ACECs (98,240 acres). Prescriptions for all SMAs vary as necessary to protect Raptor, Heronry, Springs Riparian, and other important wildlife habitat. HMPs will be developed for all wildlife SMAs.

Overall wildlife habitat condition will improve. Sensitive riparian habitats will improve significantly. Generally, the quality of vegetation will significantly improve, thereby improving habitat for wildlife. The proposed plan will improve ecological trends and wildlife species richness.

### Threatened or Endangered Species Habitat

Of the eleven Special Management Areas discussed under Wildlife Habitat, four SMAs covering 1,445 Federal surface acres and 440 acres Federal subsurface areas will be managed to protect Federally listed or candidate Threatened or Endangered plant and animal species. Management activities in these areas will be designed to benefit those



species. Federally listed species will be managed according to U.S. Fish and Wildlife Service Recovery Plans.

Threatened and Endangered (T&E) Species Habitat will improve significantly in the short and long term. Active management under the proposed plan will protect and enhance habitat and greatly decrease indirect impacts of surface disturbance on T&E species habitat.

#### SPECIAL MANAGEMENT AREAS

##### Areas of Critical Environmental Concern (ACEC)

Seven ACECs totalling 104,390 public surface acres will be designated. Designation and management of these ACECs will protect important resource values while still allowing other compatible uses.

##### Fire Management

Full fire suppression will be conducted on 1,891,168 acres of public surface. Limited fire suppression, which generally restricts off road vehicle use, will be applied to 279,832 acres to protect sensitive resource values.

##### Recreation

Most of the Resource Area will continue to be open for recreation use. Three Special Recreation Management Areas (12,270 acres) will be designated and managed for recreation values. Lonesome Ridge (2,990 acres) will be designated an ACEC and Outstanding Natural Area (ONA) and managed for primitive recreation as well as resource protection.

This plan will adequately provide diverse recreation opportunities. Increased access will open nearly all of the Resource Area to dispersed recreational use and allow ingress and egress for certain SMAs with important recreation values. Increased management of certain SMAs will greatly enhance the quality of recreation opportunities.

##### Off Road Vehicle (ORV) Management

Sixteen areas covering 170,983 acres (7.9 percent of the Resource Area) will be designated limited for ORV use. A total of 6,269 acres (0.2 percent of the Resource Area) in eight SMAs will be closed to ORV use. A total of 1,993,748 acres will be designated open for ORV use. The 900-acre Alkali Lake and the 55,800-acre Hackberry Lake ORV use areas will be the preferred locations for recreational, commercial, and organized competitive ORV events.

Sufficient recreational ORV use opportunities will be available throughout the Resource Area. Establishment of the two Intensive ORV Use Areas will ensure that other uses will not significantly interfere with recreational ORV use in these areas.

##### Cave Resources

Nineteen caves within nine cave management units totalling 8,030 acres (0.4 percent of the Resource Area) will be protected and intensively managed. Of these caves, 6,120 acres will be designated a Special Recreation Management Area (SRMA), one cave (420 acres) will be designated a Research Natural Area, 1,200 acres would be recommended as a National Natural Landmark and 2,220 acres would be designated an ACEC.

A 387,000-acre Cave Resource Primary Occurrence Zone will be managed to protect other caves either not intensively managed or as yet undiscovered. No surface disturbing activities or vibratory or explosive activities will be allowed within a minimum of 300 feet from cave resources.

Cumulatively, the Proposed Plan will have significant positive benefits to the important cave resources throughout the Resource Area.

##### Visual Resources

The Resource Area is divided into the following Visual Resource Management (VRM) classes:



Class I - 2,990 acres; Class II - 37,650 acres; Class III - 276,030 acres, and Class IV - 1,854,330 acres. The Guadalupe Escarpment Scenic Area SMA (49,570 acres) will be managed specifically to protect high visual values. Visual resources are also a factor in the management of several other SMAs.

Designating VRM classes west of the Pecos River will reduce potentially high adverse visual intrusions, particularly in the Guadalupe Escarpment Scenic Area SMA. Increased acreage of upgraded VRM class objectives within certain SMAs will significantly reduce adverse impacts to visual resources of these areas.

#### Cultural Resources

Cultural Resource Management Plans (CRMPs) will be developed for eight SMAs (22,218 acres) of which seven (17,028 acres) have been specifically identified for management of cultural resources. Management direction will emphasize the preservation, management, and use of the cultural resources found within these areas. Cultural resources throughout the Resource Area will continue to be inventoried and evaluated prior to surface disturbing activities with appropriate mitigation applied.

The proposed plan will enhance cultural resource protection by increasing protective management within Special Management Areas.

#### Paleontological Resources

Dry Cave will be managed specifically to protect the significant paleontological resources for research and will be designated a 420-acre Research Natural Area (RNA).

#### Rights-of-Way

Five rights-of-way corridors extending approximately 185 miles have been delineated to reduce environmental damage. A total of 35,051 acres or 1.6 percent of public surface lands have been designated as right-of-way avoidance areas. Avoidance areas within Special Management Areas will protect

sensitive resource values but may require rights-of-way applicants to use longer alternative routes in these areas.

#### Wilderness

The four Wilderness Study Areas (6,912 acres) will be managed in accordance with the Interim Management Policy (IMP) and Guidelines for Lands Under Wilderness Review until officially removed from such protective management. Wilderness study and recommendations are being conducted in other wilderness EIS's and are not included in this RMP.

#### ACCESS

Improved legal and/or physical access will be obtained to 25 access tracts. Access restrictions will be implemented as part of the ORV designation process, SMA activity planning, or through normal road abandonment procedures. Roads will be constructed and maintained in accordance with BLM road standards.

Acquiring additional access will help resolve access problems, reduce user complaints, and increase efficiency in managing public lands. Restricting access in 22 tracts would protect sensitive resource values and reduce unnecessary, redundant proliferation of access routes.



TABLE S-1  
SUMMARY OF RMP DETERMINATIONS

LAND USE ALLOCATION	Unit of Measure	Current Management	Proposed Plan
LAND TENURE			
State Exchange and Other Disposals	Acres Federal Surface	47,262	220,700
Acquisition			
State surface	Surface Acres	-0-	2,090
Private surface	Surface Acres	-0-	1,080
State Minerals	Mineral Acres	-0-	1,480
Private Minerals	Mineral Acres	-0-	360
Net BLM Retention	Acres Federal Surface	2,123,738	1,953,470
MINERAL AND ENERGY RESOURCES			
<u>Oil and Gas</u>			
Open for development with special stipulations	Acres Federal Minerals	360,866	601,068
Open for leasing with "No Surface Occupancy" (NSO) stipulations	Acres Federal Minerals	6,620	43,417
Withdrawn from Leasing	Acres Federal Minerals	11,680	11,680
Open for development with seasonal drilling stipulations	Acres Federal Minerals	25,000	123,290
Open for development with standard stipulations	Acres Federal Minerals	2,314,834	2,117,932
<u>Leasable Solid Minerals</u>			
Potash (acres within Oil-Potash Area only)			
Open for potash development with standard stipulations.	Acres Federal Minerals	381,740	381,740
Open for potash development with special stipulations.	Acres Federal Minerals	3,360	3,360
No potash leasing withdrawals within Oil-Potash Area	Acres Federal Minerals	9,700	9,700

TABLE S-1 (continued)  
SUMMARY OF RMP DETERMINATIONS

LAND USE ALLOCATION	Unit of Measure	Current Management	Proposed Plan
Other Leasable Solid Minerals			
Open for leasing	Acres Federal Minerals	2,707,360	2,670,704
Closed to leasing	Acres Federal Minerals	11,640	48,296
<u>Mineral Materials</u>			
Closed to Minerals Disposal	Acres Federal Minerals	1,560	61,371
Continue use of existing pits	Number (approx.)	941	case by case
Open new pits, close pits, or rehabilitate pits	Number	case by case	case by case
<u>Locatable Minerals</u>			
Lands available for location, exploration, and development of locatable minerals	Acres Federal Minerals	2,703,471	2,691,712
Withdrawals from mining claims	Acres Federal Minerals	15,529	27,288
RANGELAND RESOURCES			
<u>Livestock Grazing</u>			
Initial Forage Target	AUM	192,000	192,000
Long-Term Forage Target	AUM	216,000	225,000
No Grazing	Acres	5,000 <sup>1/</sup>	5,579
Rangeland Improvements	\$	\$200,000	\$900,000
Rangeland Improvements			
Pipeline	Miles	-0-	24
Fence	Miles	-0-	12
Water facilities	Number	-0-	10
Vegetation Treatments	Acres	5,000	62,000
Grazing Systems	No./Acres	12/200,000	50/420,000



TABLE S-1 (continued)  
SUMMARY OF RMP DETERMINATIONS

LAND USE ALLOCATION	Unit of Measure	Current Management	Proposed Plan
<u>Wildlife Habitat</u>			
Riparian Protection	Acres Federal Surface	-0-	54,500
Habitat Management Plans: (other than SMAs)			
Indian Basin Pronghorn Herd	Acres Federal Surface	-0-	114,500
Guadalupe Mule Deer Herd	Acres Federal Surface	-0-	125,000
Querecho/Bilbry Game Birds	Acres Federal Surface	-0-	96,000
SPECIAL MANAGEMENT AREAS			
<u>Fire Management:</u>			
Full Suppression	Acres Federal Surface	2,163,444	1,891,168
Limited Suppression	Acres Federal Surface	7,556	279,832
<u>Areas of Critical Environmental Concern (ACEC) Designation:</u>			
Seven River Hills (SMA #1)	Acres Federal Surface	-0-	540
Chosa Draw Caves Complex (SMA #2f)	Acres Federal Surface	-0-	2,200
Dark Canyon (SMA #4)	Acres Federal Surface	-0-	3,950
Lonesome Ridge (SMA #5)	Acres Federal Surface	-0-	2,990
Blue Spring (SMA #6f)	Acres Federal Surface	-0-	160
Los Medanos Raptor Area (SMA #13)	Acres Federal Surface	-0-	89,360

TABLE S-1 (continued)  
SUMMARY OF RMP DETERMINATIONS

LAND USE ALLOCATION	Unit of Measure	Current Management	Proposed Plan
Pecos River/Canyons Complex (SMA #18)	Acres Federal Surface	-0-	5,190
<u>Special Wildlife Habitat Management Areas</u>			
Springs Riparian Habitat (SMA 6)	Acres Federal Surface	-0-	524
Raptor Management Area (SMA 13)	Acres Federal Surface	-0-	89,360
Heronries Habitat Area (SMA 15)	Acres Federal Surface	-0-	33,200
<u>Threatened or Endangered Species Habitat</u>			
Seven River Hills (SMA 1)	Acres Federal Surface	540	540
Ben Slaughter Draw (SMA 6e)	Acres Federal Surface	-0-	205
Bluntnose Shiner Habitat (SMA 8)	Acres Federal Surface	-0-	200
Little McKittrick Draw (SMA 9)	Acres Federal Surface	-0-	500
<u>Recreation Site</u>			
Red Bluff Reservoir	Acres Federal	120	120
<u>Scenic Area Designation:</u>			
Guadalupe Escarpment (SMA #20)	Acres Federal Surface	-0-	49,570
<u>National Natural Landmark NNL Designation:</u>			
McKittrick Hill Caves Complex (SMA #2a)	Acres Federal Surface	-0-	1,200



TABLE S-1 (continued)  
SUMMARY OF RMP DETERMINATIONS

LAND USE ALLOCATION	Unit of Measure	Current Management	Proposed Plan
<u>Research Natural Area (RNA)</u>			
<u>Designation:</u>			
Dry Cave (in SMA #2a)	Acres Federal Surface	-0-	420
South Texas Hill Canyon (SMA #3)	Acres Federal Surface	-0-	1,360
Yeso Hills (SMA #7)	Acres Federal Surface	-0-	640
Little McKittrick Draw (in SMA #9)	Acres Federal Surface	-0-	100
Pecos River/Canyons Complex (in SMA #18)	Acres Federal Surface	-0-	2,320
<u>Outstanding Natural Area (ONA)</u>			
<u>Designation:</u>			
Lonesome Ridge (SMA #5)	Acres Federal Surface	-0-	2,990
<u>Special Recreation Management Area (SRMA) Designations</u>			
Cave Resources (SMA #2a-2i)	Acres Federal Surface	615	6,120
Pecos River Corridor (SMA #23)	Acres Federal Surface	120	6,000
<u>ORV Designations:</u>			
Open	Acres Federal Surface	1,154,741	1,993,748
Limited	Acres Federal Surface	19,933	170,983
Closed	Acres Federal Surface	4,615	6,269
Undesignated	Acres Federal Surface	991,711	-0-

TABLE S-1 (continued)  
SUMMARY OF RMP DETERMINATIONS

LAND USE ALLOCATION	Unit of Measure	Current Management	Proposed Plan
<u>Intensive ORV Use Areas:</u>			
Alkali Lake (SMA #21)	Acres Federal Surface	-0-	900
Hackberry Lake (SMA #22)	Acres Federal Surface	-0-	55,800
<u>Visual Resource Management (VRM) Designations:</u>			
VRM Class I	Acres Federal Surface	-0-	2,990
VRM Class II	Acres Federal Surface	10,620	37,650
VRM Class III	Acres Federal Surface	8,058	276,030
VRM Class IV	Acres Federal Surface	1,187,322	1,854,330
Undesignated	Acres Federal Surface	965,000	-0-
<u>Cultural Resource Management Area (CRMA) Designations:</u>			
Honest Injun Cave (SMA #2i)	Acres Federal Surface	10	10
Laguna Plata (SMA #10)	Acres Federal Surface	3,360	3,360
Maroon Cliffs (SMA #11)	Acres Federal Surface	12,423	11,783
Potash Bull Wheel (SMA #12)	Acres Federal Surface	4	4
Poco Site (SMA #16)	Acres Federal Surface	-0-	51
Bear Grass Draw (SMA #17)	Acres Federal Surface	-0-	1,780
Pope's Well (SMA #19)	Acres Federal Surface	40	40



TABLE S-1 (continued)  
SUMMARY OF RMP DETERMINATIONS

LAND USE ALLOCATION	Unit of Measure	Current Management	Proposed Plan
<u>Rights-of-Way</u>			
Avoidance Areas	Acres Federal Surface	7,398	35,051
Utility Rights-of-way Corridors	Miles	185	185
ACCESS			
Tracts Identified for Additional Access:			
High Priority Tracts	No. of tracts	-0-	6
Moderate Priority Tracts	No. of tracts	-0-	11
Low Priority Tracts	No. of tracts	-0-	8
Tracts Identified for Access Restrictions	No. of tracts	4	22 <sup>2/</sup>
Roads identified for easement acquisition	Miles	-0-	5

<sup>1/</sup>5,000 acres currently unallotted, although these areas are not designated "no grazing."

<sup>2/</sup>Twelve of the 22 access tracts identified for access restrictions also have portions identified for access acquisition (1 high, 9 moderate, 2 low); therefore, the total tracts equals 43 and not 55.





# CHAPTER I

PURPOSE

AND

NEED





## CHAPTER 1 - Additions and Corrections to the Draft

Table 1-1, Page 1-3. Change Gnome Withdrawal from 640 acres to 680 acres.

Page 1-6, Column 2, 1st paragraph, 3rd sentence. Delete "In the retention area, title transfers of public land will be limited to minor acreages subject to case-by-case justification; except..." Start new sentence with "Unlimited exchange opportunities..."

Page 1-6, Column 1, 5 lines from bottom. Add new paragraph, "Criteria for exchanges include findings that the action would serve the public interest, would result in better Federal land management, would satisfy important State or local needs, or would help accomplish important management objectives such as inholding acquisition, trespass abatement, access needs or resource improvements."

ALTERNATIVES





## CHAPTER 2

## ALTERNATIVES





## CHAPTER 2 - Additions and Corrections to the Draft

Page 2-3, column 2, last paragraph, second sentence. Delete and replace with: "All lands identified for disposal meet either the FLPMA 203 (Sales) or 206 (Exchange) criteria or other applicable State or Washington guidance as stated on 1-6."

Page 2-4, column 1, paragraph 4. Starting with "There is a management objective...hazardous waste dumping." Add, "..., and to make available for sale adjacent lands for the logical expansion of the existing landfill operations. Existing R&PP leases which contain patent clauses will also be available for sale under that authority."

Page 2-4. Add additional paragraph to Disposal section. "Federal lands will be made available for exchange in order to accomodate a Carlsbad Caverns National Park management objective to acquire a 320-acre private inholding belong to MR. L.E. Sloan."

Page 2-5, column 1, last paragraph. Should read, "For planning purposes it is assumed that the existing 640-acre withdrawal for the WIPP site exclusive use will be increased to 10,240 acres by means of legislation."

Page 2-11, column 2, under second indented paragraph. Add the following sentence: "Interagency procedures exist among the BLM, U.S. Dept. of Agriculture, Animal and Plant Health Inspection Service (APHIS), New Mexico Department of Game and Fish, and NMDA for professional development of annual plans for conducting Animal Damage control."

Page 2-12, under Threatened or Endangered Species Habitat. Change second sentence to read, "Necessary measures to avoid adverse impacts will be developed in consultation with the necessary agencies."

Page 2-12, column 2, paragraph 2. Add to last sentence "...and the New Mexico Natural Resources Department."

Page 2-14, column 2, first paragraph. Delete "and protect critical and fragile resource values."

Page 2-14, column 2, paragraph 2, line 2. Delete "and." After "maintained," insert "with an opportunity to provide additional developed recreation facilities at the reservoir." Delete "and" and begin last sentence with "The."

Page 2-15, Table 2-2, column A, opposite "Lonesome Ridge." Change "3,342 acres" to "3,505 acres." Change column A total acres from "7,393" to "7,556."

Page 2-15, footnote 2. Delete "all" from first sentence.

Page 2-15, footnote 4. Delete "Interior" and insert "Interim." Delete "Plan" and insert "Policy (IMP)."

Page 2-16, column 1, paragraph 1. Add as last sentence: "Painting requirements will be implemented for surface facilities."



Page 2-22, Table 2-4; Page 2-28, Table 2-7; Page 2-29, Table 2-8; and Page 2-31, Table 2-7. Add a row for Living Desert State Park and incorporate the following information.

Include Park in each table as follows:

- (1) Table 2-4, Page 2-27, for all Alternatives indicate 1,280 acres;
- (2) Table 2-7, Page 2-28, for all Alternatives indicate 1,520 acres;
- (3) Table 2-8, Page 2-29, for Alternative A indicate 0 acres; Alternatives B, C, D, and D1 indicate 1,520 acres; and
- (4) Table 2-9, Page 2-31, for Alternative A indicate 0 acres; for all other Alternatives indicate 1,520 acres.

Page 2-23, column 1, under Wildlife Habitat, paragraph 2, line 1. Delete the work "six" and insert "62."

Page 2-23, column 2, third paragraph under "Fire Management," line 2. Delete "7,393" and insert "7,556."

Page 2-23, column 2, under Recreation, paragraph 2, line 6. After "rides" insert "would be processed."

Page 2-24, footnote 1, line 1. After "numbers 2" insert "(Chosa Draw Caves Complex)," from line 2.

Page 2-24, Table 2-5, column A, opposite "Lonesome Ridge," change "3,342" acres to "3,505." Change total acres in column A from "49,580" to "49,743."

Page 2-25, column 1, under Cave Resources. Insert third paragraph, "The oil and gas lease special stipulation that prohibits drilling within 300 feet and fluid pit placement within 600 feet from known cave features would be applied to all caves in the Resource Area."

Page 2-26, column 1, Land Tenure. Delete last sentence beginning "Land sales within retention zones will be discouraged..."

Page 2-27, Table 2-6, column A, opposite "Lonesome Ridge." Change "3,342" acres to "3,505." Change total acres to column A from "360,703" to "360,861."

Page 2-29, Table 2-8, at "TOTAL ACRES" for Alternative A. Delete "13,369" and insert "11,640."

Page 2-29, footnote 6, line 2. Insert "Resource" after "Cave."

Page 2-30, column 2, under Wildlife Habitat, last paragraph. Move paragraph and insert as first paragraph under Threatened or Endangered Species Habitat.

Page 2-30, column 2, under Wildlife Habitat. Insert paragraph 4, column 1, under Threatened or Endangered Species Habitat from page 2-33 as last paragraph.

Page 2-31, Table 2-9 title. Delete "SPECIAL MANAGEMENT" from title.



Page 2-31, Table 2-9, under Alternatives B, C, D, and D1 across from Pecos River Corridor. Delete "4/" and the same footnote "4/" at bottom of table. Place "4/" under Alternatives C, D, and D1, across from "Little McKittrick Draw," and on bottom of Table correct to read "4/This prescription may be applied to 400 of this 500-acre SMA, located updrainage from the 100-acre RNA, if research determines the need to apply this prescription."

Page 2-33, column 1, under Threatened or Endangered Species Habitat. Move paragraph 4 to page 2-30, column 2, and insert as last paragraph under Wildlife Habitat.

Page 2-33, column 2, under Recreation, paragraph 1, line 11. Delete "primarily" and insert "partially."

Page 2-33, column 2, under Recreation, paragraph 2, line 6. Insert "for oil and gas exploration and development" after "NSO."

Page 2-33, column 2, under Recreation, last paragraph, last sentence. After "salable mineral," insert "solid leasable minerals."

Page 2-33, column 2, under Off-Road Vehicles, paragraph 1, line 9. Change "3,999 acres" to "3,996 acres."

Page 2-34, Table 2-11, column A opposite "Lonesome Ridge." Change "3,342" acres to "3,505." Change total acres in column A from "19,766" to "19,929."

Page 2-36, column 1, under Cave Resources, paragraph 1, line 21. Insert "2-9" after "2-8."

Page 2-36, column 1, under Cave Resources, paragraph 3, line 2. Delete "area" and insert "Zone." At line 7, insert "fluid" after "and." Insert "placement" after "pit" (singular).

Page 2-36, column 1, under Cave Resources. Insert as last paragraph, "Known caves in the 387,000 acre zone would be closed to exploration for and development of solid leasable minerals. Protection of subsurface voids during oil and gas drilling and production operations would be enforced when determined feasible."

Page 2-37, Table 2-13, under Alternative A across from "Lonesome Ridge." Change "3,342" to "3,505." Under Alternative C of the same SMA change "2,980" to "2,990." Under Alternative C across from "Maroon Cliffs" change "12,432" to "1,880." Further, delete "McKittrick Penny Royal (along Black River)<sup>5</sup>/" and all figures for this location under Alternatives A, B, C, D, and D1. Across from "TOTAL ACRES" under Alternative A change "7,398" to "7,561"; under Alternative B change "15,878" to "14,598"; under Alternative C change "39,991" to "28,068"; and under Alternative D and D1 change "57,579" to "56,318." Under Alternative C, across from "Maroon Cliffs" place a "7/" after the new figure of 1,880 and insert the following at the bottom of the page: "7/In addition, the entire 12,432-acre SMA would be closed to utility corridor development."

Page 2-37, Table 2-13, column A, opposite "Lonesome Ridge." Change "3,342" acres to "3,505." Change total acres in column A from "7,398" to "7,561."



Page 2-38, Table 2-14, column 1 of body. Insert "Class I" above "Class II"; under Alternative A, insert "0" opposite "Class I"; under Alternative B, insert "2,240" opposite "Class I"; under Alternative C, insert "2,990" opposite "Class I"; under Alternatives D and D<sub>1</sub>, insert "2,990" opposite "Class I."

Page 2-40, under Vegetation. Change "33,000" to "62,000" and change "10 percent" to "5 percent."

Page 2-41, column 1, under Threatened or Endangered Species Habitat, last paragraph, line 5. Insert "new" between "no" and "oil."

Page 2-41, column 2, under Recreation, paragraph 1, lines 4 and 5. Delete "affecting 4,271 acres of the area," and insert "and closure to solid leasable minerals within the 6,000 acre SRMA" after "leases."

Page 2-41, column 2, under Recreation, paragraph 2, line 3. Insert "a" after "in." In line 6, delete "modified" and insert "limited."

Page 2-41, column 2, under Recreation, last paragraph, second sentence. After "NSO stipulation" insert "for oil and gas exploration and development activities, closed to salable minerals and solid leasable minerals,..."

Page 2-41, column 2, under Cave Resources, paragraph 2, line 1. Delete "7,620 acres" and insert "7,900 acres."

Page 2-42, column 1, under Visual Resources, paragraph 2, line 8. Change "4,200 acres" to "4,500 acres," and change "3,120 acres" to "3,220 acres."

Page 2-42, column 1, under Visual Resources, paragraph 3, line 12. Insert "In the Dark Canyon ACEC" to begin sentence; change "A" to lower case.

Page 2-42, column 2, under Paleontological Resources, line 1. Insert "managed" between "be" and "as."

Page 2-44, column 1, under Threatened or Endangered Species Habitat, line 4. Delete "conditions" and insert "management."

Page 2-49, Table 2-15, column A, under "Fire Management" opposite "Full Suppression." Change "2,163,607" acres to "2,163,495"; opposite "Limited Suppression," change "7,393" acres to "7,505."

Page 2-53, Table 2-15, column A, under "ORV Designation." Opposite "Limited," change "19,766" acres to "19,878"; opposite "Undesignated," change "991,711" acres to "991,599."

Page 2-54, Table 2-15, column A under "Rights-of-Way," opposite "Avoidance Areas," change "7,398" acres to "7,510."



## INTRODUCTION

This chapter is divided into two sections: (1) additions and corrections to the Draft EIS and (2) description of the Proposed Plan. The Proposed Plan includes both new management policy the BLM would implement as well as the continuing management guidance which would have been implemented for all alternatives.

## HOW THE PROPOSED PLAN WAS SELECTED

The Proposed Plan was selected by the District Manager and Area Manager. It was selected based on (1) issues raised throughout the planning process, (2) public input received during the formal 90-day comment period and at meetings and hearings, (3) planning criteria used to evaluate alternatives, and (4) the environmental analysis developed on the previously formulated alternatives. A description of the alternatives is contained in the Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). The plan was reviewed and approved by the State Director.

## DESCRIPTION OF THE PROPOSED PLAN

This section describes for each issue the management objectives and the proposed management actions. The Proposed Plan is a modified version of Alternative C of the Draft EIS. To reduce publishing costs, many of the DEIS maps and tables have not been repeated. Therefore, the FEIS should be reviewed along with applicable parts of the DEIS. Minor changes have been made based on public input on the DEIS and the acquisition of new information. The Proposed Plan also incorporates the recently drafted supplemental program guidance for several resource programs.

The proposed management prescriptions have been analyzed carefully to ensure that less restrictive prescriptions would not provide adequate resource protection. Rationales for each Special Management Area (SMA) have been expanded to show this analysis and are available for review in the Carlsbad Resource Area.

In addition to some changes in the content of Alternative C of the DEIS, the Proposed Plan clarifies questions brought out in the comments on the DEIS.

## LAND TENURE ADJUSTMENT

### Disposal

The proposed plan could result in the disposal of about 220,700 acres of public lands from Federal ownership (about 10 percent of the CRA surface acres).

Disposals authorized by previous management decisions include lands in the Loco Hills community area, the Waste Isolation Pilot Plant (WIPP), scattered tracts in east Lea County, and those lands not classified for retention.

Lands identified for disposal will meet FLPMA 203 criteria. Disposals will be processed case by case under the requirements of National Environmental Policy Act (NEPA) and are subject to public review through the EA process.

Items to be examined while considering the merits of any land tenure adjustment are discussed in the DEIS, page 2-4.

There is a management objective to consolidate public land holdings in contiguous land ownership patterns.

Lands identified for disposal which have no legal public access and only one adjacent landowner will be offered in noncompetitive sales at fair market value.

Where possible, public lands identified for disposal will be exchanged for non-Federal lands that have been identified for acquisition to support BLM resource management programs. In all cases, land exchange is the Bureau's preferred disposal method.

Public lands which contain valuable wildlife habitat but are otherwise suitable for disposal will be considered for exchange only with State or local agencies or nonprofit private organizations with wildlife or habitat management responsibilities.



Existing authorized permits, leases, rights-of-way, and licenses will be identified as valid existing rights.

All existing R&PP sanitary landfills will be disposed of and adjacent lands will be made available for FLPMA sale for the logical expansion of the landfills.

Federal lands will be made available for exchange to accommodate the NPS objective to acquire a 320-acre private inholding.

Land sales within the retention zone will be discouraged, though not completely disallowed. Other land use authorizations such as R&PPs could also be allowed in retention zones if they are consistent with multiple use objectives for the area.

#### Retention

Approximately 1,950,300 acres would be retained under BLM administration. The BLM will retain all of the approximately 2,719,000 acres of mineral rights.

Public lands will be retained if cultural, paleontological, or other resources of national, State, or regional significance are found, and the possible adverse effects of the disposal action cannot be mitigated.

Public lands will be retained if they provide access to other Federal lands, unless access rights for public uses can be reserved.

#### Acquisition

BLM will attempt to acquire 1,080 acres of private land for the Blue Spring, the Chosa Draw, and the Pecos River/Canyons Complex ACECs. An estimated 2,090 acres of State land is proposed for acquisition in the Laguna Plata, and Pecos River/Canyons complex SMAs.

#### Exchange

State surface/Federal subsurface lands will have a high priority for exchange in order to minimize the split estate acreage.

## MINERALS AND ENERGY RESOURCES

Leasable minerals are managed under the authority of the Mineral Leasing Act of 1920, Mineral Leasing Act of 1926 and Potash Leasing Act of 1927. Leasable minerals present in the CRA include oil, natural gas, potash, sulfur, and sodium. Regulations that pertain to these minerals are 43 CFR 3100 for oil and gas, and 43 CFR 3500 for other leasable minerals.

#### Oil and Gas Leasing

Leasing of oil and gas will be in accordance with the Environmental Assessment (EA) Oil and Gas Leasing (BLM 1981). Regulations that have been issued as Orders or Notices to Lessees (NTL) concerning environmental and other factors associated with the drilling of oil and gas wells and the sale of oil and gas are listed in the DEIS, page 2-6.

#### Availability of Land for Leasing

Federal mineral estate will continue to be open for oil and gas leasing except for 11,680 acres that is currently withdrawn. These withdrawals are the Gnome site (680 acres), the State Militia site (720 acres), the WIPP site (10,240 acres), and the Little Walt Canyon quarry site (40 acres). All of these withdrawals are nondiscretionary and have been closed to leasing by decisions beyond the scope of the BLM.

#### Availability of Land for Geophysical Exploration

A Notice of Intent (NOI) before entry on any public lands and a Notice of Completion upon any cessation of activity, must be filed with the Area Manager for any exploration. Geophysical operations are addressed in 43 CFR 3045 and Onshore Oil and Gas Order #1.

Any geophysical operations conducted will comply with ORV designations and ensure protection of sensitive or fragile resources. As necessary, a safety and resource clearance will be conducted prior to any geophysical operations.



Determinations affecting geophysical exploration include leaving 2,174,632 acres (80 percent CRA subsurface) open to exploration under standard terms and conditions provided for on the NOI, and as determined by the clearance.

Restrictions to geophysical exploration are proposed for a total of 544,368 acres (20 percent CRA subsurface) (see Table 2-1). Seismic equipment or drilling of sampling holes using off-road vehicular equipment will generally not be permitted in these areas. Equipment using vibratory or explosive methods will not be permitted near cave resources.

#### Constraints on Surface Use for Development

Federal mineral estate open for development under standard terms and conditions will total 2,117,932 acres (77.9 percent CRA subsurface). These areas are available for development within the terms of the standard lease form.

The proposed plan will increase the acreage of Federal mineral estate under special stipulations from 360,866 acres to 601,068 acres (22.1 percent CRA subsurface). The specific affected areas generally conform to the Special Management Area (SMA) boundaries shown on Map D of the DEIS and maps for certain SMAs in Appendix E of the FEIS.

Of the total acreage with special stipulations, 43,417 acres (1.6 percent CRA subsurface) would be under a No Surface Occupancy (NSO) stipulation. Table 2-2 lists the areas that would be affected by NSO stipulations. This stipulation will apply to new leases or existing leases after termination or exploration.

#### Minor Constraints

Seasonal stipulations will be increased from 25,000 acres to 123,290 acres (4.5 percent CRA subsurface) as shown on Table 2-4.

Oil and gas production and storage facilities may not be allowed in 100-year floodplains. Drilling will be allowed in the floodplain

only if there is no reasonable alternative. BLM will require a plan to prevent contamination or adverse impacts to the floodplain.

Disposal of produced water in unlined pits may be allowed in areas described in Order No. R3221-B. Disposal in pits or by injection wells will be in accordance with NTL-2B.

Disposal pits east of the Pecos River will be allowed except in the following areas: 100-year flood plains; near drainages, playas, water wells, or springs; or in SMAs 10, 12, 18, 19, and 23. Pits would not be allowed west of the Pecos River in the Capitan and Back Reef Areas including the 387,000 acre primary cave occurrence zone or other special designated areas. Lined pits will be required in all other areas west of the Pecos River.

Netting will be required on all water disposal pits or open tanks.

The current stipulation requiring a 300-foot separation distance between known cave or karst features and any development operation will be applied in the cave primary occurrence zone. Additional provisions include the cessation of drilling if circulation is lost due to a cave or void to a depth of generally 800 feet. The operator will notify the BLM who, along with the operator, will assess the resources at risk and the probable environmental impacts. Options for mitigation will include but will not be limited to: plugging the hole and moving to another location or a special casing program.

#### Leasable Solid Minerals

##### Potash

Management of potash leasing is described in the Environmental Assessment Report (EAR) on Potash Leasing in Southeast New Mexico (BLM 1975) and the East Eddy/Lea MFP (BLM 1979), and is incorporated into this RMP by reference.

Oil and gas leasing within the potash enclave will continue based on the provisions of the Secretarial Order (November 5, 1975) and the NMOCDC regulations R-111, A through N. Potash leasing within the enclave will continue



TABLE 2-1  
PROPOSED GEOPHYSICAL EXPLORATION RESTRICTIONS

Location Special Management Areas	PROPOSED PLAN (surface acres)	TYPE RESTRICTION
1 Seven River Hills ACEC	540	Limited ORV
2 Cave Resources	8,030	Limited/Closed ORV, no vibratory or explosive methods
3 South Texas Hill Canyon	1,360	Limited ORV
4 Dark Canyon	3,950	Limited ORV
5 Lonesome Ridge	2,990	Closed to ORV
6 Springs Riparian Habitat	524	Limited/Closed ORV
7 Yeso Hills	640	Limited ORV
8 Bluntnose Shiner Habitat	200	Closed to ORV
9 Little McKittrick Draw	500	Closed to ORV
10 Laguna Plata	3,360	Limited/Closed ORV
11 Maroon Cliffs	11,783	Limited ORV
12 Potash Bull Wheel	4	Limited ORV
13 Los Medanos Raptor Area	89,360	Seasonal <sup>1/</sup>
15 Heronries Habitat Area	33,200	Seasonal <sup>2/</sup>
16 Poco Site	51	Limited ORV
17 Bear Grass Draw	1,780	Limited ORV
18 Pecos River/Canyons Complex	5,190	Limited/Closed ORV
19 Pope's Well	40	Closed to ORV
20 Guadalupe Escarpment Scenic Area	49,570	Limited ORV
23 Pecos River Corridor	6,000	Limited ORV
Living Desert State Park	1,520	Closed
Southern Gypsum Soil Area	62,840	Limited ORV
Cave Resources Primary Occurrence Zone	387,000	No vibratory or explosive methods near caves
TOTAL ACRES	544,368 <sup>3/</sup>	(20.0 percent subsurface)

<sup>1/</sup> Restrictions apply to 1/4-mile radius of active raptor nests (eggs or nestlings or Swainson hawk, Harris hawk, and great horned owl present in the nest). Details of restrictions are incorporated in Chapter 2 text under the Wildlife section.

<sup>2/</sup> Restrictions apply to 1/4-mile radius (126 acres) around active heronries within the SMA. Details of restrictions are incorporated in Chapter 2 text under the Wildlife section.

<sup>3/</sup> Total is less than the sum of the area figures because of overlap of different areas.



Table 2-2  
EFFECTS OF NO SURFACE OCCUPANCY ON FLUID MINERALS DEVELOPMENT POTENTIAL

Location		Current Management	Proposed Plan	Moderate Potential	High Potential
Special Management Area: <sup>1/</sup>					
1	Seven Rivers Hills	540	540	200	340
2(a)	McKittrick Hill Caves Complex	-0-	4,920	4,680	240
2(b)	Lost Cave	-0-	20	-0-	20
2(c)	Fence Canyon Caves Complex	-0-	340	-0-	340
2(d)	Little Manhole/Big Manhole Caves	-0-	100	100	-0-
2(e)	Yellowjacket/Lair Caves	-0-	260	260	-0-
2(f)	Chosa Draw Caves Complex	-0-	1,160 <sup>1,2/</sup>	1,160	-0-
2(g)	Mudgetts/Little Mudgetts Caves	-0-	50	50	-0-
2(h)	Honest Injun Cave	-0-	10	10	-0-
2(i)	Komensky's Fantastic Fabulous Caverns (KFFC)	-0-	130	130	-0-
3	South Texas Hill Canyon	-0-	1,360	1,360	-0-
4	Dark Canyon	-0-	4,020 <sup>2/</sup>	3,820	200
5	Lonesome Ridge	1,200	2,990	2,990	-0-
6	Spring Riparian Habitat:				
6(c)	Cottonwood Spring	-0-	108	108	-0-
6(e)	Ben Slaughter Draw	-0-	205	205	-0-
7	Yeso Hills	-0-	640	640	-0-
8	Bluntnose Shiner Habitat	-0-	200	200	-0-
10	Laguna Plata	1,080	1,120 <sup>1/</sup>	-0-	1,120
11	Maroon Cliffs	1,880	1,880	840	1,040
12	Potash Bull Wheel	-0-	4	4	-0-
18	Pecos River/Canyons Complex	-0-	4,100 <sup>1/</sup>	2,820	1,280
19	Pope's well	40	40	40	-0-
20	Guadalupe Escarpment Scenic Area	-0-	11,700 <sup>2,3/</sup>	10,820	880
23	Pecos River Corridor	-0-	6,000	4,680	1,320
Living Desert State Park Area		1,520	1,520	1,520	-0-
TOTAL ACRES (Federal Minerals)		6,260	43,417	36,917	6,760
PERCENT RESOURCE AREA		0.2%	1.6%	1.5%	0.2%

<sup>1/</sup>Federal mineral acres.

<sup>2/</sup>Acreage excludes any nonpublic minerals proposed for acquisition.

<sup>3/</sup>Acreage includes both federal surface and federal subsurface minerals estate and non-Federal surface/federal subsurface minerals estate in Zone 1, only.



under standard stipulations and special stipulations concerning oil and gas. NSO stipulations will be applied to new leases in Laguna Plata. Potash prospecting outside the enclave will not be allowed on 41,956 acres.

#### Other Leasable Solid Minerals

Other leasable solid minerals are managed under the authority of the Mineral Leasing Act of 1920 as amended and the 43 CFR 3500 regulations.

The proposed plan will increase the area not open to leasing of sodium, sulfur, and other leasable solid minerals from the present 11,640 acres to 48,296 acres (1.8 percent CRA subsurface). The proposed RMP will leave 2,670,704 acres (98.2 percent CRA subsurface) open to leasing and development under standard terms and conditions or with stipulations to reduce surface disturbance.

#### Mineral Materials

Management for mineral materials is described in the Environmental Assessment for Mineral Material Sales and Permits in the Roswell District (BLM 1981).

Caliche, sand, gravel, building stone, and other salable minerals will continue to be available on 2,657,629 acres (97.8 percent CRA subsurface) of public lands. New caliche pits will be permitted only when existing pit locations are not close enough to support multiple-use needs. Usually this distance is three miles.

Applications for the removal of common variety mineral materials will be processed and stipulations to protect important resource values will be attached to permits.

Salable minerals will continue to be managed under the authority of the Mineral Materials Act of 1947 and the Common Varieties Act of 1955, except where proposed closures (shown on FEIS Table 2-4 and Map D of the DEIS) would prohibit new pits. Mining plans and reclamation plans would be required for all mineral material sales and free use permits.

#### Locatable Minerals

In addition to the existing 15,529 acres of withdrawals, 11,759 acres will be withdrawn from mineral entry (see Table 2-4). All other public mineral estate is open to mineral entry and development.

All operators in wilderness study areas exceeding the casual use threshold must file a plan of operations pursuant to regulations of 43 CFR 3802. The 43 CFR 3802 regulations are designed to ensure that wilderness values are preserved and that no unnecessary or undue degradation to the public lands and resources occur.

Validity examinations of claims may be initiated where there is a conflict with a disposal application, or the land is needed for a Federal program, or where unauthorized use of the land or mineral resource is occurring.

For those areas open to locatable minerals, BLM approval is not required to casually prospect for minerals or locate mining claims on public land. However, prior to using mechanized earth moving equipment or explosives on mining claims, the operator must notify the BLM Area office of the proposed operations. In addition, an operator must also notify the BLM if he plans to use off road vehicles for locatable mineral exploration or development in areas closed or restricted under 43 CFR 8340. Notice of intents, which do not require BLM approval, may be filed where disturbances are less than 5 acres annually and are not in areas defined in 43 CFR 3809.1-4.

Operations exceeding 5 acres of disturbance annually must file a plan of operations with the BLM. The BLM has the authority to approve or modify the plan pursuant to 42 CFR 3809.1-6. Disturbance of more than five acres requires the operator to submit a plan of operations for approval. Both the notice and plan are required under 43 CFR 3809, Surface Management of Public Lands. The 43 CFR 3809 regulations are designed to ensure that no unnecessary or undue degradation occurs to the public lands and resources.



## RANGELAND RESOURCES

### Soil, Water, and Air

Soil, water, and air resources will continue to be evaluated on a project basis through the NEPA process.

Watershed activity plans will be developed and will include watershed treatments such as reseeding, or erosion and flood control structures.

#### Soils

Soils will be managed to maintain productivity and to minimize erosion. Proposed surface disturbing projects will be analyzed to determine suitability of soils to support and sustain such projects. Projects on suitable soils will be designed to minimize soil loss. Projects proposed on unsuitable soils may be denied, moved, or modified.

Surface-disturbing activities on slopes 30 percent or more will be allowed only after considering site-specific conditions.

Reclamation of disturbed sites in sensitive areas may include, in addition to standard procedures, those listed on page 2-8 of the DEIS.

Soils management will include coordination with the related programs of State, local, and other Federal agencies.

#### Water

Water quality will be maintained or improved in accordance with applicable State and Federal pollution control laws and regulations. Federal laws include the Clean Water Act of 1977, EO 11752 (December 1973), and EO 11988 (May 1977). Requirements include consultation with State agencies on proposed projects that could significantly affect water quality.

Flood hazards will be evaluated in planning for facilities, land disposals, and other proposals, to reduce the risks of flood loss. If there are suitable alternatives, floodplain sites will be avoided (BLM 7221,

Floodplain Management, EO 11988, Clean Water Act, PL 95-217 - 33 USC 466). Construction activities in rivers, wetlands or streams require a section 404 permit from the U.S. Army Corps of Engineers.

Water rights will be acquired or perfected as necessary through State law and administrative claim procedures, except as otherwise specifically mandated by Congress.

#### Air

All activities will comply with applicable State and Federal air quality laws and regulations. Stipulations will be incorporated into project proposals to mitigate impacts to quality.

The New Mexico Environmental Improvement Division (NMEID) has the primary responsibility for monitoring and enforcing air quality regulations and standards.

### Vegetation

Approximately 62,000 acres west of the Pecos River are proposed for vegetation treatment. Less than five percent of the acreage will be treated chemically. The remainder of the acreage will be treated with prescribed burning.

Several herbicides which are currently labeled by the Environmental Protection Agency (EPA) and approved by the New Mexico Department of Agriculture for use in the State of New Mexico will be used.

All applications of herbicides will be under the supervision of a certified herbicide applicator and will be carried out in compliance with State and Federal laws. Application rates of herbicides will be determined based on individual range sites and the conditions at the time of application. Livestock use will be deferred for a minimum of two growing seasons following herbicide application. A site-specific EA will be prepared prior to vegetation treatments to determine the impacts.

If additional herbicides effective on mesquite or creosotebush are approved prior to



the proposed vegetation treatment, they would be considered for use.

### Livestock Grazing

Approximately \$900,000 of BLM rangeland improvement funds will be spent on rangeland improvements to improve ecological condition on poor and fair rangelands.

The 12 existing Allotment Management Plans (AMPs) will be fully implemented and maintained. An additional 50 Cooperative Management Plans (CMPs) will be developed and implemented. Total acres covered by AMPs and CMPs will be 420,000 (see DEIS Appendix D-6).

### Management Guidance

The guidance in the East Roswell Grazing EIS (BLM 1979) will be implemented and continue to be based upon long-term monitoring studies. It will be accomplished through negotiation or by grazing decisions for allotments east of the Pecos River.

### Tracts Unleased for Grazing

Approximately 5,000 acres of public land are unleased and will remain available for consideration for authorized grazing in accordance with BLM grazing regulations (43 CFR 4110 and 43 CFR 4130). All public lands leased for grazing will be managed in accordance with the objectives of this plan.

### Allotment Categorization

All grazing allotments have been assigned one of three management categories based on present conditions, potential for improvement, other resource conflicts and opportunities for positive economic return on public investments (see Appendix D-1 of the DEIS).

### Cooperative Management Plans

Section 8 of PL-95-514 specifically requires consultation, cooperation, and coordination with lessees, permittees and landowners, the

District Grazing Advisory Boards, and state agencies involved in the development, revision, or evaluation of allotment management plans.

Cooperative Management Plans (CMPs) will be developed in cooperation with the livestock operator and based upon allotment-specific management actions (see Appendix D-2 of the DEIS), resource characteristics such as soil and vegetation potential and water availability, other land management objectives, operator needs, implementation costs, and general management actions (see Appendix D-3 of the DEIS). Typical grazing plans available for consideration are described in Appendix D-4 of the DEIS.

CMPs will be prepared for Category I allotments within constraints set by this RMP. These CMPs would specifically define the following:

Resource conflicts;

Management goals and objectives;

Level of management necessary to achieve the stated goals and objectives;

Planned rangeland improvements; and

Method of evaluation and monitoring.

The grazing systems are designed to meet management objectives and goals for each allotment. The grazing objectives would include, but not be limited to, desired changes in species composition, improved rangeland and watershed condition, accommodation of physiological needs of plants, consideration for wildlife values of riparian areas, big game habitat and endangered species habitat, and the realization of beneficial return of dollars expended in achieving the overall management objectives.

### Monitoring

A monitoring program (see Appendix D-5 of the DEIS) will be established to determine whether the goals and objectives of the RMP are being achieved. As a minimum, the monitoring studies will collect data on actual



livestock use, wildlife use, degree of key forage species utilization, climatic conditions, and rangeland ecological condition and trend. When undesirable or unintended changes in resource values are discovered and the causes are determined, corrective action will be taken.

#### Livestock Use Adjustments

Current BLM policy emphasizes the use of a systematic monitoring program to verify the need for livestock adjustments.

Livestock use adjustments can be made by changing the kind and class of livestock grazing the allotment, the season of use, the stocking rate, or the grazing pattern. Future requests for changes in kind of livestock would be analyzed through EAs. Most livestock use adjustments will occur in Category I allotments. However, use adjustments may occur for allotments in Categories C and M.

Initial stocking rates are based upon the best data currently available and are not final. Initial and potential carrying capacities have been estimated for each allotment (see Appendix D-6 of the DEIS). All livestock use adjustments will be determined through monitoring and implemented through mutual agreement or by decision. When adjustments are made through mutual agreement, they may be implemented once the Rangeland Program Summary has been through a public review period. The Public Rangeland Improvement Act of 1978 (PL 95-514) outlines the Section 8 consultation policy.

It is the intent of the Bureau of Land Management, New Mexico, to expand the concept of consultation, cooperation, and coordination (hereafter referred to as consultation) into all phases of the grazing program which includes programs and policies and the execution of such programs and policies which affect grazing.

The procedures apply specifically to the target group but also may apply to other affected interests. These procedures consist of seven phases and are intended to ensure compliance with Section 8 of PL-95-514.

These phases are:

- I. Preplanning and Allotment Categorization
- II. Inventory and Inventory-Related Studies
- III. Resource Management Plan (RMP), Management Framework Plan (MFP) Amendment (Grazing), and Environmental Impact Statement (EIS) Development
- IV. Rangeland Program Summary and Updates
- V. Livestock Adjustments, Grazing Programs, Cooperative Management Plans, Revisions, or Evaluations
- VI. Rangeland Monitoring
- VII. Documentation

The Federal regulations that govern changes in livestock forage provide specific direction for livestock use adjustments implemented by decision (43 CFR 4110.3-1, 43 CFR 4110.3-2, and 43 CFR 4110.3-3). The regulations specify that "permanent increases in livestock forage or suspensions of preference shall be implemented over a 5-year period, unless, after consultation with the affected permittees or lessees and other affected interests, an agreement is reached to implement the increase or suspension in less than five years."

#### Rangeland Improvements

Typical rangeland improvements are described in Appendix D-7 of the DEIS. The extent, location, and timing of such actions will be based on the allotment-specific management objectives adopted through the CMP process, contributions from operators or others, and BLM funding capability.

All rangeland improvements will be subjected to an economic analysis to develop a priority ranking of allotments on which to commit the rangeland improvement funds.

When rangeland improvements are implemented on public land, BLM will follow the procedures and design specifications to protect resources as mandated by laws, regulations,



manual requirements, and policies. This EIS analyzes cumulative impacts of proposed rangeland improvements. However, prior to implementation, site-specific EAs will analyze the impacts from individual projects.

Watering facilities, fences, and cattleguards constructed primarily for livestock will be routinely maintained by permittees unless specific arrangements are made to the contrary. Permittees will make periodic inspections, conduct routine maintenance, and report major damage or malfunction. Disturbance of vegetation at all project sites will be held to a minimum. Nonstructural improvements, such as prescribed burns or brush control, will be maintained by BLM.

Appendix D-8 of the DEIS describes guidance for livestock grazing in the CRA.

#### Wildlife Habitat

The wildlife program manages habitat for all forms of aquatic and terrestrial wildlife on public lands, and is concerned with:

- Protecting and managing habitats of Federal and State listed, and proposed T&E plants and animals;

- Giving priority attention to aquatic, wetland, riparian, and floodplain areas, and to special habitat features such as water holes, caves, groves of trees, cliffs, and ledges;

- Maintaining habitats to support viable, self-sustaining populations of wildlife as constrained by habitat capacity; and

- Ensuring that animal damage control is carried out in a systematic manner which responds to resource protection, human health, and livestock protection needs while protecting public safety, domestic animals and nontarget wildlife.

The wildlife program will be conducted in cooperation with the New Mexico Department of Game and Fish. Fish and wildlife habitat will continue to be evaluated as a part of project level planning and will consider the significance of the proposed project and the

sensitivity of fish and wildlife habitat in the affected area. Stipulations will be attached as appropriate to assure compatibility of projects with management objectives for fish and wildlife habitat. Habitat improvement projects will be implemented to stabilize and/or improve unsatisfactory or declining wildlife habitat condition. Such projects will be identified through Habitat Management Plans (HMP), Cooperative Management Plans (CMP), or other activity plans.

Reintroduction or transplants of native animal species on public lands will be conducted only on highly suitable habitat for the species of concern. Specifically, pronghorn antelope reintroduction guidelines will follow the model formulated in the Roswell pronghorn study (New Mexico State University 1983) and will be conducted according to NMDG&F regulations and State laws. Transplant or stocking of exotic animal species will be discouraged on BLM lands but may take place under special circumstances.

Forage and cover will be provided for big game species populations as established jointly with the NMDG&F. These big game requirements will be met by limiting utilization of vegetation by domestic livestock and habitat improvement projects.

Rangeland improvements will be designed to facilitate use by wildlife. BLM controlled water sources will be available year-long for wildlife use. The 62 existing game water developments will be maintained either by BLM or by cooperative management agreements. New fences will be constructed and existing fences modified, as the need is identified in activity plans, to conform with BLM New Mexico State Office Manual Supplement 1737.

Vegetation treatment projects will include designs to protect and improve wildlife habitat condition. Seasonal restrictions will continue to be applied where they are needed to mitigate the impacts of human activities on important seasonal wildlife habitat (see Table 2-4).

Management actions within floodplains or wetlands will include measures to preserve, protect, and restore the natural functions as



required by EO 11988 and 11990. Degradation of stream banks and loss of riparian vegetation will be minimized to ensure their protection.

Recent aquatic/riparian management guidance from the U.S. Department of Interior (USDI) emphasizes greater protection of the resources. Studies and monitoring efforts will be established to determine the impacts of livestock, mineral industry, and recreation upon these resources.

A 125,000-acre mule deer HMP will be implemented. This would be concentrated in pinyon/juniper grass mountain, mixed shrub hill, and riparian standard habitat sites. A 114,500-acre HMP will be implemented for pronghorn antelope and includes the grass flat, mixed shrub rolling upland, and riparian standard habitat sites. A game bird HMP will be implemented for a 96,000-acre area which will principally cover the mesquite sand dune and sand shinnery oak habitat sites. Management prescriptions for all of the game species HMPs will include water development and vegetative treatments. CMPs which incorporate wildlife habitat objectives will be developed on all I category allotments.

All riparian standard habitat sites (approximately 54,500 acres) will be intensively managed to assure water and vegetative quality for the associated wildlife resources. Management prescriptions for these areas could include fence modifications or livestock use adjustment.

An aquatic/riparian HMP will be developed for all perennial water sources and associated riparian communities on public lands. To date, 524 acres have been identified as the Springs Riparian SMA for incorporation into the proposed HMP. As additional seeps, springs, creeks, etc., on BLM are identified, they will also be incorporated into the HMP. Management prescriptions will include vegetation treatments, fence modification, and livestock use adjustment.

The 62,840-acre Southern Gypsum Soil Area will be managed to protect endemic gypsumphilic vegetation and fragile soils. Management prescriptions will include limited ORV use, and restricted geophysical and fire

suppression. A 640-acre RNA will be designated in Yaso Hills to conduct long-term research within the gypsum ecosystem. Prescriptions will include no surface disturbance and livestock exclusions except where beneficial for research purposes.

An RNA of 1,360 acres will be designated for South Texas Hill Canyon to conduct long-term research within the Chihuahuan Desert ecosystem. Prescriptions will include no surface disturbance and livestock exclusion except where beneficial for research purposes.

A 2,320-acre Research Natural Area (RNA) and 5,190-acre ACEC will be designated in the Pecos River/Canyon Complex. Riparian and associated resources along a section of free flowing river will be protected to promote long-term research within the Pecos River ecosystem. Livestock grazing and surface disturbing activities will be excluded within the RNA except where beneficial for research purposes.

An 89,360-acre ACEC will be established to protect and improve raptor habitat in the Los Medanos area. Seasonal restrictions on all surface disturbing activities will apply to a 1/4-mile radius around active nests (eggs or juveniles present in nest) for swainson hawk, harris hawk, and great horned owl. Active nests would most likely be encountered between March 15 and July 30 with a maximum delay period for oil and gas development of 85 days. A raptor management plan will be written to outline prescriptions for habitat improvement.

A 33,200-acre Special Management Area will be established to protect and improve habitat for great blue heron, black crowned night heron, little blue heron, tri-colored heron, snowy egret, and cattle egret. Seasonal restrictions on all surface disturbing activities will apply to a 1/4-mile radius around active heronries (eggs or juveniles present in nests) for the species listed above. A management plan will be written to outline prescriptions for habitat improvements.

Seasonal drilling restrictions will be removed from the San Simon Swale Pronghorn Habitat area.



## Threatened and Endangered Species Habitat

BLM will ensure that actions authorized, funded, and carried out do not jeopardize Federal or State listed T&E species nor result in destroying or modifying officially listed critical habitat according to state and Federal laws. Section 7 consultation will be conducted with the U.S. Fish and Wildlife Service on all "may affect" situations. Management activities in Threatened, Endangered, or sensitive species habitat will be designed to benefit those species.

Federally listed species will be managed according to U.S. Fish and Wildlife Service Recovery Plans. State listed species will be protected through Cooperative Agreements with the NMDG&F and New Mexico Department of Natural History.

An activity plan following the guidance of the Gypsum Wild Buckwheat Recovery Plan will be developed for 205 acres in Ben Slaughter Draw to provide intensive management for populations of the Federally listed Threatened gypsum wild buckwheat (Eriogonum gypsophilum).

An ACEC will be designated for 160 acres of Federal surface and 440 acres of Federal sub-surface adjacent to Blue Spring to protect the Federally Listed Endangered Pecos gambusia (Gambusia nobilis) and its habitat. No surface disturbance activities will be allowed. An activity plan following the guidelines of the Pecos Gambusia Recovery Plan will be developed for Blue Spring if 480 acres of private and State surface can be acquired.

The bluntnose shiner critical habitat (200 acres) will be managed according to FWS recovery plan guidelines. This will include livestock adjustments, restricted surface disturbance, and NSO for oil and gas.

A 100-acre RNA will be developed to protect the Federal candidate species, ramshorn snail (Pecosorbis kansensis), located in Little McKittrick Draw. Stipulations providing for no surface disturbance and livestock exclusion will protect the habitat while providing research opportunities to determine biological requirements in an additional 400 acres

upstream from the RNA. All surface disturbances will be excluded on a case-by-case basis if research indicates that they will be detrimental to the ramshorn snail and its habitat.

Prescriptions for Seven Rivers Hills ACEC will include protective withdrawals from locatable minerals and closure to mineral sales. The USF&WS Recovery Plan for gypsum wild buckwheat species will continue to be implemented.

## SPECIAL MANAGEMENT AREAS

Table 2-3 displays the acres proposed for special management. There will be 22 Special Management Areas (SMA) totalling 275,772 acres of public land (12.7 percent CRA surface). Each SMA will have an activity plan developed to meet the management objectives for the benefitting activities and resources.

## Areas of Critical Environmental Concern (ACEC)

There are seven ACECs proposed for a total of 104,390 public land surface acres. They include Seven River Hills (540 acres), Chosa Draw Caves Complex (2,200 acres), Dark Canyon (3,950 acres), Lonesome Ridge (2,990 acres), Blue Spring (160 acres), Los Medanos Raptor Area (89,360 acres), and Pecos River/Canyons Complex (5,190 acres). Identified nonfederal lands and minerals proposed for acquisition would become part of these ACECs if they are acquired. Management prescriptions for the proposed ACECs are provided in Table 2-4 and on maps for specific SMAs in Appendix E.

## Fire Management

Fire on public land will be managed according to one of two fire response levels--full or limited. Table 2-4 shows the areas and number of acres proposed for limited suppression. Limited Suppression allows fire suppression activities to be dictated by prescribed fire parameters; i.e., temperature, fuels, wind, humidity, etc., to meet natural resource management objectives. Some areas may also have restrictions on the types or intensities



TABLE 2-3  
SPECIAL MANAGEMENT AREAS  
PROGRAM EMPHASIS FOR ACTIVITY PLAN DEVELOPMENT

	Program Emphasis	Unit of Measure	Current Management	Proposed Plan
Special Management Area: <sup>1/</sup>				
1 Seven Rivers Hills	Wildlife	Surface Acres	540	540
2 Cave Resources <sup>2/</sup>	Rec/Cult/ VRM/Nat Hist	Surface Acres	595	8,030
3 South Texas Hill Canyon	Wildlife	Surface Acres	-0-	1,360
4 Dark Canyon	Rec/VRM	Surface Acres	2,941	3,950
5 Lonesome Ridge	Rec/Wild- life/VRM	Surface Acres	3,505	2,990
6 Springs Riparian Habitat	Wildlife	Surface Acres	-0-	524
7 Yeso Hills	Soils/Water/ Wildlife	Surface Acres	-0-	640
8 Bluntnose Shiner Habitat	Wildlife	Surface Acres	-0-	200
9 Little McKittrick Draw	Wildlife	Surface Acres	-0-	500
10 Laguna Plata	Cultural	Surface Acres	3,360	3,360
11 Maroon Cliffs	Cultural	Surface Acres	12,423	11,783
12 Potash Bull Wheel	Cultural	Surface Acres	4	4
13 Los Medanos Raptor Area	Wildlife	Surface Acres	-0-	89,360
14 San Simon Swale Pronghorn Habitat	Wildlife	Surface Acres	25,000	-0-
15 Heronries Habitat Area	Wildlife	Surface Acres	-0-	33,200
16 Poco Site	Cultural	Surface Acres	-0-	51
17 Bear Grass Draw	Cultural	Surface Acres	-0-	1,780
18 Pecos River/Canyons Complex	Rec/VRM/ Cult/Wildlife	Surface Acres	1,215	5,190
19 Pope's Well	Cultural	Surface Acres	40	40
20 Guadalupe Escarpment Scenic Area	Rec/VRM	Surface Acres	-0-	49,570
21 Alkali Lake ORV Area	Recreational	Surface Acres	-0-	900
22 Hackberry Lake ORV Area	Recreational	Surface Acres	-0-	55,800
23 Pecos River Corridor	Rec/Wild- life/Soils/ Water	Surface Acres	120	6,000
TOTAL ACRES			19,743	275,772
PERCENT RESOURCE AREA			0.9%	12.7%

<sup>1/</sup> Acreage does not include private/State lands proposed for acquisition for SMA numbers 2 (Chosa Draw Caves Complex), 6 (Blue Springs), 10, and 18. Acreage does not include Federal minerals estate under non-Federal surfaces proposed for acquisition or other management prescriptions.

<sup>2/</sup> Includes Dry Cave paleontological site.



of fire suppression activities allowed; e.g., equipment restrictions, in order to protect other resource values. Fire management plans will be written for limited suppression zones. Specific boundaries and prescriptions will be designated to meet the identified objectives of the areas. All other areas will be under full suppression.

### Recreation

Management objectives in the Special Recreation Management Areas (SRMAs) will include developing facilities and intensive visitor management. On public land where recreation is not the principal management objective, management direction will provide for access, visitor information and protecting resources from user damage.

Recreation Area Management Plans (RAMPs) will be prepared for designated SRMAs. These RAMPs will address levels and types of management actions necessary to achieve the recreation objectives in the RMP.

Impacts to recreation opportunities will be analyzed in EAs written for specific projects. Such analysis will consider the significance of the proposed project and the sensitivity of recreation resources. Stipulations will be attached to minimize conflicts with recreation management objectives.

At Red Bluff Reservoir, the boat ramp will be maintained and 120 acres will be developed for intensive recreation use as part of the proposed 6,000-acre Pecos River Corridor SRMA. The SRMA will be a half-mile wide corridor along the Pecos River managed to provide quality water-based recreation opportunities on public land parcels while protecting natural and scenic qualities. Management prescriptions are shown in Table 2-4 and depicted on Appendix E Map.

The proposed 2,990-acre Lonesome Ridge ACEC and Outstanding Natural Area (ONA) would be managed to adequately protect the area's outstanding natural and scenic values in an unaltered condition. Management prescriptions for the SMA are shown in Table 2-4 and depicted on Appendix E Map.

### Off-Road Vehicle (ORV) Management

The use of off-road vehicles (ORV) will be controlled and managed to protect the resources of the public lands, to promote the safety of all users, and to minimize conflicts among the various users of those lands. All areas will be designated as limited, closed, or open for ORV use. Emergency ORV designations can be implemented in problem areas.

Sixteen areas covering 170,983 acres (7.9 percent of the Resource Area) will be designated limited for ORV use (see Table 2-4). A total of 6,269 acres (0.2 percent of the Resource Area) in eight SMAs will be closed to ORV use (see Table 2-4). The remaining 1,993,748 acres will be designated open for ORV use.

The 900-acre Alkali Lake and the 55,800-acre Hackberry Lake Intensive ORV Use Areas will be the preferred locations for recreational, commercial, and organized competitive ORV events.

### Cave Resources

Caves on public lands will be managed to protect their natural values, while still allowing recreational, educational, and scientific use. Nineteen caves within nine cave management units will be protected and intensively managed. There will be 6,120 acres designated as a Cave Resources SRMA. Dry Cave will be designated a Research Natural Area (RNA) specifically for paleontological research (420 acres), and 1,200 acres would be recommended as a National Natural Landmark. Chosa Draw will be designated an ACEC (2,220 acres). Honest Injun Cave will be managed for its cultural values (10 acres). A total of 0.4 percent of the Resource Area (8,030 acres) of intensively managed cave resources will be protected. Management prescriptions for those intensively managed cave management units will include NSO for oil and gas exploration and development, ORV use closure or limitation (to designated routes only), restricted surface disturbance, withdrawal of locatable minerals, closure to solid leasable minerals and salable minerals,



restrictions on geophysical operations and rights-of-way actions, limited fire suppression, and management under VRM class II and class III objectives.

A 387,000-acre Cave Resource Primary Occurrence Zone will be managed to protect other caves either not intensively managed or as yet undiscovered. The protection of these caves will include no surface disturbance allowed within a minimum of 300 feet from known cave entrances, passages, major karst features, or blowholes. Other caves would be intensively managed when additional information justifies the need for the protection of visitors or resources.

Known caves will be closed to exploration for and development of solid leasable minerals. Protection requirements for subsurface voids during oil and gas drilling operations will be enforced when determined feasible by the BLM Authorized Officer.

### Visual Resources

Proposed activities and projects will be evaluated for consistency with Visual Resource Management (VRM) objectives. The impacts of each action will be determined in site-specific EAs prior to implementation. The EA will consider the significance of the proposed project, the visual sensitivity of the affected area, and the impacts of the project. Stipulations will be attached as appropriate to ensure compatibility of projects with management objectives for visual resources. Painting requirements will be implemented for surface facilities in accordance with established policy. Activities may be modified to blend with the characteristic landscape or be denied if visual contrast is excessive. No advertising signs will be permitted on public land. Directional signs must be authorized by the BLM and meet Bureau specifications.

The VRM classes are: Class I - 2,990 acres; Class II - 37,650 acres; Class III - 276,030 acres; and Class IV - 1,854,330 acres (see DEIS Appendix I for definitions).

The Lonesome Ridge ACEC/ONA will be the only area with Class I management. Areas with

Class II visual management objectives will include: Guadalupe Escarpment Scenic Area (8,820 acres-Zone I), six cave management units (5,800 acres), Pecos River Corridor (4,500 acres), Dark Canyon (3,220 acres), and the Pecos River/Canyons Complex (4,100 acres). The remaining acreage in Class II is located in the west Rio Pecos Canyon (3,520 acres), Guadalupe Ridge/El Paso Gap area (2,080 acres), and the Seven River Hills area (2,080 acres, including the designated 540-acre SMA).

Zone 2 (40,750 acres) of the Guadalupe Escarpment Scenic Area will be managed with class III VRM objectives to protect visual quality and sensitivity (see Appendix E Map). Zone I of the Scenic Area and Zone I of the Dark Canyon ACEC will have an NSO stipulation on oil and gas leasing, a closure to mineral material sales, and a limited ORV use designation. In the Dark Canyon ACEC, a seasonal "no drilling" stipulation will be in effect between April 1 and September 15 annually on 730 acres to reduce adverse visual impacts during the high use season at Carlsbad Caverns National Park.

### Cultural Resources

Cultural resources will continue to be inventoried and evaluated prior to surface disturbing activities. Where avoidance is not possible, mitigation measures will be developed based on the cultural use evaluation system and in consultation with the State Historic Preservation Officer (SHPO). Conflicts will be resolved in accordance with 36 CFR 800 and the Memorandum of Agreement between the New Mexico SHPO and BLM.

The statutory and policy guidance for cultural resource management establishes direction and management objectives which guide BLM multiple-use activities on the public lands and is listed on page 2-16 of the DEIS.

Cultural Resource Management Plans (CRMPs) will be developed for Maroon Cliffs, Laguna Plata, Pierce Canyon, the Poco site, Bear Grass Draw, Pope's Well, and the Potash Bull Wheel. Management direction will emphasize the preservation, management, and use of the cultural resources found within these areas. Emphasis will be on protecting the soils and



vegetation to enhance the natural environment of the areas and the cultural resource settings. Mineral resources may be developed under existing laws, policy, and regulations provided that existing cultural resource values are protected. Other resource and land management activities will be managed to avoid conflicts with cultural resources.

Completion of cultural resources Class 1 overview report and the Statewide Data Synthesis Project will continue to have a high priority.

Proposed specific management actions for cultural resources include the following (see Table 2-4):

1. Identify eight special management areas; Laguna Plata, Maroon Cliffs, Potash Bull Wheel, the Poco Site, Bear Grass Draw, and Pope's Well, Honest Injun Cave, and the Pecos River/Canyons Complex (a total of 22,218 acres) for cultural resource management.
2. Attach no surface occupancy stipulations to oil and gas leases in the Laguna Plata (1,120 acres), Pope's Well (40 acres), and Potash Bull Wheel (4 acres) SMAs on new leases or reissuance of existing leases.
3. Add a restricted surface disturbance stipulation to Potash leases within the Laguna Plata and Maroon Cliffs SMA and the oil and gas leases within the Poco Site and Bear Grass Draw SMAs on new leases or reissuance of existing leases.
4. Retain the special stipulation applied to potash leases in the Laguna Plata SMA (3,360 acres) and add a similar stipulation to potash leases in the Maroon Cliffs SMA (11,783 acres) on new leases or reissuance of existing leases.
5. Add a special stipulation to new oil and gas leases in the Poco Site (51 acres) and Bear Grass Draw (1,780 acres) requiring extensive mitigative work on cultural sites within these SMAs.
6. Close the Laguna Plata, Maroon Cliffs, and Potash Bull Wheel SMAs to any mineral materials sales.

7. Close Laguna Plata to all solid minerals leasing with the exception of Potash.

8. Enforce the existing ORV closure for the Laguna Plata SMA, close the Pope's Well SMA to ORV use, and limit vehicles to designated routes in the Maroon Cliffs, Potash Bull Wheel, Poco Site, and Bear Grass Draw SMAs.

9. Designate the Laguna Plata, Maroon Cliffs, Potash Bull Wheel, and Pope's Well SMAs as Rights-of-way avoidance areas.

10. Acquire 1,280 acres of non-Federal land and mineral estate in the Laguna Plata SMA.

11. Apply limited fire suppression to all SMAs except the Potash Bull Wheel.

12. Complete National Register nominations for six cultural SMAs.

13. Survey the Pecos River/Canyons SMA and 9,903 acres in the Maroon Cliffs SMA to establish boundaries for National Register nominations for these SMAs.

14. Complete CRMPs for all cultural SMAs.

15. Monitor sensitive cultural resource areas for ORV impacts. If the monitoring program reveals significant impacts to cultural sites in any of these areas, emergency closures or limitations for ORV use will be imposed.

#### Paleontological Resources

Paleontological sites will be managed to protect their scientific and educational values. Dry Cave will be managed specifically for the significant paleontological resources associated with it and it will be designated as a 420-acre Research Natural Area (RNA) (see Table 2-4).

#### Rights-of-Way

##### Corridors

Previous planning designated 5 corridors extending approximately 185 miles (see Map 2-2 in the DEIS) as the preferred locations



available for utility and energy transportation facility development. This plan proposes no new corridors.

#### Avoidance Areas

The plan designates 35,051 acres as avoidance areas, or 1.6 percent of the public surface lands in the CRA. Areas protected by law, such as archaeological sites, T&E species habitats, etc., will continue to be avoided as determined necessary through the EA process.

Avoidance areas will be generally unavailable for utility and transportation facility development. Exceptions may be granted if the proposed facility benefits or does not impact the resource that formed the basis for identifying the area.

#### Wilderness

The four Wilderness Study Areas (WSA), Lonesome Ridge, Mudgetts, Devil's Den, and McKittrick Canyon, will be managed in accordance with the Interim Management Policy (IMP) and Guidelines for Lands Under Wilderness Review until officially removed from such protective management. This RMP will form the basis for future management of these areas if they are not designated wilderness. Mudgetts' WSA is being studied as part of the New Mexico BLM Statewide Wilderness EIS. The three other WSAs are being studied as a cooperative effort with Lincoln National Forest as part of their planning process.

If the WSAs are determined not suitable as wilderness, or not designated by Congress, 2,990 acres of the 3,050-acre Lonesome Ridge area will be included in the Lonesome Ridge ACEC/ONA. The remainder would be included within zone 1 of the Guadalupe Escarpment Scenic Area. About 1,200 acres of Mudgetts area will be included in the Dark Canyon ACEC.

The remainder of the Mudgetts area (about 2,142 acres), Devil's Den Canyon area (320 acres), and McKittrick Canyon area (200 acres) will be managed in accordance with existing BLM guidance for multiple use activities. They will be designated open for

ORV use, with the Mudgetts area managed in accordance with VRM class III objectives, and Devil's Den Canyon and McKittrick Canyon areas in accordance with VRM class II objectives.

#### ACCESS

Legal access for general public use and BLM administration will be obtained in six high priority, eleven moderate, and eight low priority access tracts (see Table F-1 and Map 2-3 of the DEIS). Activity plans will be prepared to determine the best available method (of those described on pages 2-17 and 2-19 of the DEIS) for providing access to public lands within these access tracts.

Access restrictions will be implemented as part of the ORV designation process, SMA activity planning, or through normal road abandonment procedures.

Roads will be constructed and maintained in accordance with BLM road standards. Comprehensive Transportation System Management Plans will be developed for each county in the Carlsbad Resource Area to establish functional classification and maintenance responsibilities for needed roads, and identify unnecessary roads that will be closed and rehabilitated.





TABLE 2-4 SPECIAL AREA DESIGNATIONS/PRESCRIPTIONS

	SMA 1	SMA 2	SMA 3	SMA 4	SMA 5	SMA 6	SMA 7	SMA 8
TOTAL SURFACE ACRES	540	8,230	1,360	3,950	2,990	524	640	200
TOTAL SUBSURFACE ACRES	540	8,470	1,360	4,750	2,990	804	640	200

Designation/Special Area Delineations

Area of Critical Environmental Concern (ACEC)	540	2,200		3,950	2,990	160		
Right-of-way Avoidance Area	540	5,510	1,360	3,220	2,990	804	640	200
Research Natural Area (RNA)		420	1,360				640	
National Natural Landmark (NNL)		1,200						
Special Recreation Management Area (SRMA)		6,120		150				
Cultural Resource Management Area (CRMA)		10						
Outstanding Natural Area (ONA)					2,990			
Intensive ORV Use Area								
Scenic Area								
Spring Riparian Habitat						524		
Threatened or Endangered (T&E) Habitat	540					205		200
Raptor Management Area								
Heronries Habitat Area								
Recreation Site								

Management Prescriptions

Restrict Surface Disturbance	540	8,030	1,360	3,950	2,990	524	640	200
No Surface Occupancy (NSO)	540	6,990	1,360	4,020	2,990	313	640	200
Restrict Geophysical	540	8,030	1,360	3,950	2,900	524	640	200
Close to Solid Mineral Leasing	540	4,305			2,990	801	640	200
Close to Mining Claim Location	540	2,825			2,990	804	640	200
Close to Mineral Material Disposal	540	8,470	1,360	4,750	2,990	804	640	200
Close to ORV Use		60			2,990	144		200
Limit ORV Use	540	7,970	1,360	3,950		380	640	
Limit Fire Suppression	540	8,030	1,360	3,950	2,990	523	640	200
Class I VRM					2,990			
Class II VRM	540	5,800		3,220				
Class III VRM		740		730				
Remove Livestock Grazing			1,360			439	640	200
Acquire Non-Federal Surface		480				450		
Acquire Non-Federal Minerals		40				200		
Acquire Access (miles)		.5		3	1.5			
Seasonal Stipulations				730				
Other Special Stipulations								

TABLE 2-4 SPECIAL AREA DESIGNATIONS/PRESCRIPTIONS (continued)

	SMA 9	SMA 10	SMA 11	SMA 12	SMA 13	SMA 15	SMA 16
TOTAL SURFACE ACRES	500	3,360	11,783	4	89,360	33,200	51
TOTAL SUBSURFACE ACRES	500	3,360	11,783	4	(89,360)	33,200	51

Designation/Special Area Delineations

Area of Critical Environmental Concern (ACEC)					89,360		
Right-of-way Avoidance Area	500	3,360	11,783	4			
Research Natural Area (RNA)	100						
National Natural Landmark (NNL)							
Special Recreation Management Area (SRMA)							
Cultural Resource Management Area (CRMA)		3,360	11,783	4			51
Outstanding Natural Area (ONA)							
Intensive ORV Use Area							
Scenic Area							
Spring Riparian Habitat							
Threatened or Endangered (T&E) Habitat	500						
Raptor Management Area					89,360		
Heronries Habitat Area						33,200	
Recreation Site							

Management Prescriptions

Restrict Surface Disturbance	500	2,240	11,783		89,360	33,200	51
No Surface Occupancy (NSO)		1,120	1,880	4			
Restrict Geophysical	500	3,360	11,783	4	89,360	33,200	51
Close to Solid Mineral Leasing	500	3,360					
Close to Mining Claim Location	500						
Close to Mineral Material Disposal	500	3,360	11,783	4			
Close to ORV Use	500	1,120					
Limit ORV Use		2,240	11,783	4		33,200	51
Limit Fire Suppression	500	3,360	11,783				51
Class I VRM							
Class II VRM							
Class III VRM		3,360					
Remove Livestock Grazing	500						
Acquire Non-Federal Surface		1,280					
Acquire Non-Federal Minerals		1,280					
Acquire Access (miles)							
Seasonal Stipulations					89,360	33,200	
Other Special Stipulations		3,360					51

Note: SMA 14 was dropped from consideration between the Draft and Final EIS.



TABLE 2-4 SPECIAL AREA DESIGNATIONS/PRESCRIPTIONS (continued)

	Gnome Site 1/	WIPP Site 1/	Little Walt Canyon Quarry Site 1/	State Militia Parcel 1/	Pecos River Project (Red Bluff Area 1/
<u>Designation/Special Area Delineations</u>					
Area of Critical Environmental Concern (ACEC)					
Right-of-way Avoidance Area					
Research Natural Area (RNA)					
National Natural Landmark (NNL)					
Special Recreation Management Area (SRMA)					
Cultural Resource Management Area (CRMA)					
Outstanding Natural Area (ONA)					
Intensive ORV Use Area					
Scenic Area					
Spring Riparian Habitat					
Threatened or Endangered (T&E) Habitat					
Raptor Management Area					
Heronries Habitat Area					
Recreation Site					
<u>Management Prescriptions</u>					
Restrict Surface Disturbance					
No Surface Occupancy (NSO)					
Restrict Geophysical					
Close to Solid Mineral Leasing	680	10,240		720	
Close to Mining Claim Location	680	10,240	40	720	1,729
Close to Mineral Material Disposal	680	160		720	
Close to ORV Use					
Limit ORV Use					
Limit Fire Suppression					
Class I VRM					
Class II VRM					
Class III VRM					
Remove Livestock Grazing					
Acquire Non-Federal Surface					
Acquire Non-Federal Minerals					
Acquire Access (miles)					
Seasonal Stipulations					
Other Special Stipulations					

1/These areas include formal withdrawals subject to management decisions beyond the scope of this RMP. Some of the known, major prescriptions are included in this table to show where acreage under special management applies outside the SMAs.

TABLE 2-4 SPECIAL AREA DESIGNATIONS/PRESCRIPTIONS (continued)

	SMA 17	SMA 18	SMA 19	SMA 20	SMA 21	SMA 22	SMA 23
TOTAL SURFACE ACRES	1,780	5,190	40	49,570	900	55,800	6,000
TOTAL SUBSURFACE ACRES	1,780	5,190	40	49,570	900	55,800	6,000
<u>Designation/Special Area Delineations</u>							
Area of Critical Environmental Concern (ACEC)		5,190					
Right-of-way Avoidance Area		4,100	40				
Research Natural Area (RNA)		2,320					
National Natural Landmark (NNL)							
Special Recreation Management Area (SRMA)							6,000
Cultural Resource Management Area (CRMA)	1,780		40				
Outstanding Natural Area (ONA)							
Intensive ORV Use Area					900	55,800	
Scenic Area				49,570			
Spring Riparian Habitat							
Threatened or Endangered (T&E) Habitat							
Raptor Management Area							
Heronries Habitat Area							
Recreation Site							120
<u>Management Prescriptions</u>							
Restrict Surface Disturbance	1,780	5,190		49,570			6,000
No Surface Occupancy (NSO)		4,100	40	11,700			6,000
Restrict Geophysical	1,780	5,190	40	49,570			6,000
Close to Solid Mineral Leasing		4,100		11,700			6,000
Close to Mining Claim Location		4,100					
Close to Mineral Material Disposal		5,190		11,700			6,000
Close to ORV Use		1,215	40				6,000
Limit ORV Use	1,780	3,975		49,570			5,880
Limit Fire Suppression	1,780	5,190	40	49,570			
Class I VRM							
Class II VRM		4,100		8,820			4,500
Class III VRM		1,090		40,750			1,500
Remove Livestock Grazing		2,320					120
Acquire Non-Federal Surface		960					
Acquire Non-Federal Minerals		320					
Acquire Access (miles)							
Seasonal Stipulations							
Other Special Stipulations				49,570	900	55,800	



TABLE 2-4 SPECIAL AREA DESIGNATIONS/PRESCRIPTIONS (continued)

	Living Desert State Park 1/	Southern Gypsum Soil Area	W. Carlsbad Limited Fire Suppression Area	Cave Resources Primary Occurrence Zone
<u>Designation/Special Area Delineations</u>				
Area of Critical Environmental Concern (ACEC)				
Right-of-way Avoidance Area				
Research Natural Area (RNA)				
National Natural Landmark (NNL)				
Special Recreation Management Area (SRMA)				
Cultural Resource Management Area (CRMA)				
Outstanding Natural Area (ONA)				
Intensive ORV Use Area				
Scenic Area				
Spring Riparian Habitat				
Threatened or Endangered (T&E) Species Habitat				
Raptor Management Area				
Heronries				
Recreation Site				
<u>Management Prescriptions</u>				
Restrict Surface Disturbance				387,000
No Surface Occupancy (NSO)	1,520			
Restrict Geophysical	1,520	62,840		387,000
Close to Solid Mineral Leasing	1,520			
Close to Mining Claim Location	1,280			
Close to Mineral Material Disposal	1,520			
Close to ORV Use				
Limit ORV Use		62,840		
Limit Fire Suppression		62,840	135,605	
Class I VRM				
Class II VRM				
Class III VRM				
Remove Livestock Grazing				
Acquire Non-Federal Surface				
Acquire Non-Federal Minerals				
Acquire Access (miles)				
Seasonal Stipulations				
Other Special Stipulations				387,000

1/These areas include formal withdrawals subject to management decisions beyond the scope of this RMP. Some of the known, major prescriptions are included in this table to show where acreage under special management applies outside the SMAs.

TABLE 2-4 SPECIAL AREA DESIGNATIONS/PRESCRIPTIONS (continued)

	TOTALS (Acres + % BLM surface acres unless otherwise indicated)	
<u>Designation/Special Area Delineations</u>		
Area of Critical Environmental Concern (ACEC)	104,390	(4.8%)
Right-of-way Avoidance Area	35,051	(1.6%)
Research Natural Area (RNA)	4,840	(0.2%)
National Natural Landmark (NNL)	1,200	(less than 0.1%)
Special Recreation Management Area (SRMA)	12,270	(0.6%)
Cultural Resource Management Area (CRMA)	17,028	(0.8%)
Outstanding Natural Area (ONA)	2,990	(0.1%)
Intensive ORV Use Area	56,700	(2.6%)
Scenic Area	49,570	(2.3%)
Spring Riparian Habitat	524	(less than 0.1%)
Threatened or Endangered (T&E) Species Habitat	1,445	(less than 0.1%)
Raptor Management Area	89,360	(4.1%)
Heronries	33,200	(1.5%)
Recreation Site	120	(less than 0.1%)
<u>Management Prescriptions</u>		
Restrict Surface Disturbance	536,804 <sup>1/</sup>	(19.7% subsurface)
No Surface Occupancy (NSO)	43,417	(1.6% subsurface)
Restrict Geophysical	544,368 <sup>1/</sup>	(20.0% subsurface)
Close to Solid Mineral Leasing	48,296	(1.8% subsurface)
Close to Mining Claim Location	27,288	(1.0% subsurface)
Close to Mineral Material Disposal	61,371	(2.3% subsurface)
Close to ORV Use	6,269	(0.3%)
Limit ORV Use	170,983 <sup>1/</sup>	(7.9%)
Limit Fire Suppression	279,832 <sup>1/</sup> , <sup>2/</sup>	(12.9%)
Class I VRM	2,990	(0.1%)
Class II VRM	37,650 <sup>3/</sup>	(1.7%)
Class III VRM	276,030 <sup>3/</sup>	(12.7%)
Remove Livestock Grazing	5,579	(0.3%)
Acquire Non-Federal Surface	3,170	(0.1%)
Acquire Non-Federal Minerals	1,840	(less than 0.1%)
Acquire Access (miles)	5 miles <sup>4/</sup>	
Seasonal Stipulations	123,290	(4.5% subsurface)
Other Special Stipulations	447,111 <sup>1/</sup>	(20.6%)

1/Totals are less than sum of areas because certain acreages overlap.

2/Acreage represents maximum. Some overlap may occur within the West Carlsbad Limited Fire Suppression Area.

3/Totals are greater than sum of areas because of additional VRM class designations on areas outside SMAs.

4/Miles of access reflect the legal access needs both inside certain SMAs and that needed to reach certain other SMAs.







## CHAPTER 3

# AFFECTED ENVIRONMENT





## CHAPTER 3 - Additions and Corrections to the Draft

Page 3-3, column 1, last sentence should read, "An additional 9,600 acres to support the WIPP project is pending congressional action for withdrawal."

Page 3-3, column 2, fourth sentence. Change "transuranic (low level radioactive)" to "national defense activity generated transuranic radioactive."

Page 3-4, column 2, paragraph 4. Add after first sentence under OIL AND GAS "(1984 information)."

Page 3-7, column 1, last paragraph. Change "Sodium" to "Sodium chloride."

Page 3-10, column 2, under Surface Water, line 2. Delete "4,500" and insert "4,230." Line 3. Delete "4,230" and insert "4,000."

Page 3-15, column 1, under WILDLIFE HABITAT, line 8. Delete "D-10" and insert "D-11."

Page 3-16, column 2, paragraph 2. Delete sentence "Population numbers are increasing, especially in mixed shrub hill SHSs."

Page 3-17, legend. Change "Federal" to "BLM."

Page 3-19, column 1, under Small Game, paragraph 1, line 6. Delete "40" and insert "10"; change "chickens" to "chicken" (singular); delete "were" and insert "leks have been."

Page 3-19, column 1, under Small Game, after last paragraph. Insert subheading "Game Fish" and below it the second paragraph from column 2 under THREATENED OR ENDANGERED SPECIES.

Page 3-19, column 1, under Nongame, first paragraph, line 2. Delete "birds" and insert "passerines."

Page 3-19, column 2, under THREATENED OR ENDANGERED SPECIES. Move second paragraph to column 1 and insert as last paragraph under Small Game.

Page 3-19, column 2, under AREAS OF CRITICAL ENVIRONMENTAL CONCERN, first paragraph citation. Change citation from "FLPMA 103(q)" to "FLPMA 103(a)."

Page 3-22, column 2, paragraph 2, line 4. Change "3,342" acres to "3,505."

Page 3-23, column 1, under SPECIAL AREAS, last paragraph in column, line 5. Delete "and" and insert "some with riparian habitat essential to several wildlife species."

Page 3-23, column 2, under SPECIAL AREAS, first paragraph, lines 4 and 5. Delete all of line 4 and "wildlife species" from line 5.

Page 3-23, column 2, under SPECIAL AREAS, third paragraph, line 2. Delete "is associated" and insert "contains." At line 3, insert "protection of" between "for" and "the." At line 4, add the sentence "This area lies within the proposed critical habitat zone for the shiner." to the end of the paragraph.

Page 3-25, column 1, under SPECIAL AREAS, paragraph 3, line 21. Insert "State" before "Endangered."

Page 3-25, column 2, under SPECIAL AREAS, third paragraph, line 6. Change "8,880 acres" to "8,820 acres."

Page 3-27, column 2, under CAVES, first paragraph, line 8. Delete "two" and insert "fluid."

Page 3-29, column 2, paragraph 2 under "VISUAL RESOURCES," line 14, change "28,980" acres to "29,092." At line 15 change "286,900" acres to "286,788."



## CHAPTER 4

### ENVIRONMENTAL CONSEQUENCES





## CHAPTER 4 - Additions and Corrections to the Draft

Page 4-2, under Livestock Grazing, 2nd paragraph. Change sentence to read, "Additional forage will be authorized for use on a temporary, nonrenewable basis until, through monitoring studies, it is determined to be permanently available on a sustained yield basis."

Page 4-3, column 2, under Visual Resources, first paragraph, line 5. Delete "within a 10 year period."

Page 4-11, column 1 under "Off Road Vehicles," first sentence. Change "2,146,619" acres to "2,146,507."

Page 4-14, column 1, under "Rights-of-Way" and "Avoidance Areas" line 2 in last paragraph. Change "7,398" acres to "7,510."

Page 4-19, column 1, under Wildlife Habitat, first paragraph, line 11. Delete "moderately."

4-19, column 2, under Wildlife Habitat, paragraph 3, line 1. Delete "Seasonal"; and begin sentence with "Restrictions." Insert "on all surface disturbing activities" after "Restrictions."

Page 4-20, column 2, under Recreation, paragraph 3. Delete "120 acre."

Page 4-21, column 1, under Summary, line 4. Change "SMA" to "SRMA."

Page 4-22, column 2, under Visual Resources, paragraph 6, line 2. Change "199,000 acres" to "190,000 acres."

Page 4-29, column 2, under Wildlife Habitat. Delete paragraph 5.

Page 4-36, column 1, last paragraph. Change "102,596" to "5,240."

Page 4-37, column 1, under Soil and Water, line 18. Delete "west" and insert "east."

Page 4-39, column 1, under Summary, first paragraph, line 2. Delete "slightly" and insert "moderately."

Page 4-40, column 1, under Off-Road Vehicles, line 23. Change "1,847,091 acres" to "1,838,710 acres."

Page 4-49, Table 4-13, column A opposite "ORV Use," line 4. Change "24,381" acres to "24,493."

Page 4-49, Table 4-13, opposite Cave Resources, under Alternative D entry, line 5. Change "387,060 acres" to "387,000 acres."





## INTRODUCTION

This chapter provides the basis for selecting the proposed plan. Both the beneficial and adverse impacts have been analyzed.

The standard stipulations, operating procedures, and mitigation measures that are part of the continuing management guidance were considered in the assessment of impacts.

The specific actions, mitigating measures and livestock grazing related decisions based on the East Roswell Grazing Environmental Impact Statement (BLM 1979) are incorporated into this document by reference.

## ASSUMPTIONS FOR IMPACT ANALYSIS

### GENERAL

The analysis of impacts is based on the following assumptions:

1. Annual precipitation and climate will be near normal.
2. All management actions will be implemented over a 10-year period.
3. Adequate funds and personnel will be available for implementation.
4. Effects of implementation will be monitored and management adjusted as necessary.
5. No major policy changes will take place.
6. Short term refers to effects occurring within ten years (up to 1996). Long term refers to effects occurring up to twenty years (2006) and beyond.
7. Baseline data are accurate.
8. Environmental assessments (EAs) will be completed before starting construction of any project.

### RESOURCE SPECIFIC

#### LAND TENURE ADJUSTMENTS

The policy and environmental constraints to land disposals as outlined in Chapter 2 will

be fully considered on a site-specific basis prior to land tenure adjustment actions.

### MINERALS AND ENERGY

#### Oil and Gas

Oil and gas resources over one-half mile from a drill site cannot be drained without directional drilling.

The environmental stipulations in the Roswell District Oil and Gas EA (BLM 1981) are required mitigation. These stipulations are being implemented and will continue in the long term.

An average of 2,500 acres a year have been approved for oil and gas activities (roads, pads, pipelines, material pits, disposal pits, etc.) between 1981 and 1985. The overall rate of oil and gas development will continue at or near this level.

Additional special stipulations will compound the difficulties of lease development imposed by seasonal drilling, no surface occupancy (NSO) stipulations, or off-road vehicle (ORV) limitations or closures.

Oil and gas related projects will be accomplished in a manner similar to previous activity, and will result in similar environmental impacts.

#### Leasable Solid Minerals

##### Potash

The management guidance for potash leasing as described in the Potash Leasing Southeast New Mexico Environmental Assessment Record (EAR) (BLM 1975) will continue to apply.

##### Other Leasable Solid Minerals

The three producing sodium leases will continue to be worked and a few sodium prospecting permits may be applied for over the next twenty years.

There will be a demand for sulphur prospecting permits of 10 to 12 per year as there has been since the 1960's.



### Mineral Materials

Demand for salable mineral materials is expected to continue to be dependent on the amount of oil and gas drilling occurring. A smaller demand for salable minerals is expected for maintenance of county and state roads.

### Locatable Minerals

Few mining claims are expected to be filed.

## RANGELAND RESOURCES

### Soil and Water

Demands for water supply and concerns for water quality will continue to grow.

Standard stipulations (CRA Office Files) protecting soil and water from impacts associated with mineral exploration and development will be included in mineral leases. Site-specific stipulations will be included in EAs prepared for all actions.

### Vegetation

Expected changes as a result of implementing intensive grazing systems are improved vegetation condition in the long term. This assumption is substantiated by studies concerning deferred rotation grazing systems by Keng and Merrill (1960). Deferred and rest-rotation systems are considered to be equal to deferred rotation for vegetative response.

### Livestock Grazing

Increases in available forage are based upon inventory data and estimation of improved ecological condition.

Additional forage will be authorized for use on a non-renewable basis for livestock until it is determined through monitoring studies to be permanently available on a sustained yield basis.

Actual use will be equal to the 5-year average licensed use (1980-84), although a few operations may vary.

### Wildlife Habitat

All actions will be in accordance with existing Federal and State laws and the Department of Interior, Bureau of Land Management policy and manual requirements.

Improvement of habitat quality will increase animal health and numbers within the affected ecosystem.

Deterioration of habitat quality will decrease wildlife health and numbers overall within the affected ecosystem.

Removal of habitat will decrease wildlife numbers.

Presence or absence of water, vegetation, and soil are limiting factors for wildlife numbers.

Current New Mexico Department of Game and Fish (NMDG&F) policies will remain the same.

NMDG&F will successfully control game populations on a Herd Management Unit basis.

Significant increases in sediment yield will adversely affect fisheries.

The condition of the riparian zone will influence the quality of the aquatic environment.

## SPECIAL MANAGEMENT AREAS

### Recreation

Demand for recreation opportunities, such as ORV and caving activities, will remain proportional to population changes. Other recreational activities, such as hunting, are not related to population changes.

### Visual Resources

Any visual changes which meet Visual Resource Management (VRM) class objectives are not



considered significant impacts. An action resulting in a change in VRM classification is considered significant.

Any actions which cause short-term impacts are not considered significant where rehabilitation will be implemented to return visual contrast to within acceptable limits within a 10-year period.

### Cultural Resources

Cultural resources will continue to deteriorate from natural forces, visitation, and vandalism if corrective and preventative action is not taken.

Increases in site vandalism are directly proportional to new or improved access near cultural sites.

### Rights-of-Way

#### Corridors

Impacts within the existing right-of-way corridors will be dependent upon proposed facility developments, and must be evaluated in site-specific EAs.

### ACCESS

BLM will reserve access across disposed parcels in cases where public access to adjacent land is needed.

There will be no significant change (increase or decrease) in Federal, State, or county maintained public road systems throughout the CRA.

### SOCIAL AND ECONOMIC CONDITIONS

Social and economic analyses are based on the assumption that current livestock and oil and gas market conditions will continue through the planning period.

The public opinions, attitudes, and concerns expressed in the Socio-Economic overview

(Harbridge House Inc. 1979) prepared for the East Roswell Grazing EIS (BLM 1979) are still representative.

The price of oil and natural gas will not experience any major changes in price.

Natural gas will not be deregulated by Congress.

Taxation rates and policies concerning oil and natural gas will not undergo any major change.

The ranch budgets constructed for this assessment constitute a composite economic model which describes "typical ranches" and are not the budgets of any particular ranch.

The ranch budgets used for this assessment constitute an economic model of ranches as profit-maximizing enterprises and cannot completely describe any behavior that is influenced by noneconomic factors. In this regard, a standard allowance was made for depreciation of ranch equipment and improvements, although some ranch operators do not make full provision for such costs. These ranchers may have fully depreciated their capital investment; therefore, the allowance for depreciation may tend to overestimate the costs and underestimate profits.

Those livestock operations that have Section 15 permits only do not represent total operations; therefore, when estimating the various size categories, these operations were excluded.

The calf-crop percentage and the average weight of animals marketed will remain unchanged.

The ranch budgets are based on total herd sizes rather than just those numbers of Animal Units (AU) dependent on public land. Economic impacts are based on adjustments on public lands as they relate to total operation.

The average tax rate for Eddy and Lea Counties is \$12.1 per thousand dollars of assessed valuation, and the assessed valuation is \$1.89 per acre.



## IMPACTS OF THE PROPOSED PLAN

### LAND TENURE ADJUSTMENTS

See Table 4-1 for the impacts associated with land acquisition. This Proposed Plan will result in a more active land tenure adjustment program. Both sales and exchanges will increase impacts created by disposal actions regardless of the method used to carry out the transaction (see Tables 4-2 and 4-3).

The main benefit of exchange is that it tends to balance the impacts of disposal with those of acquisition.

Long-term impacts of land tenure adjustments will be negligible, since the net acreage in Federal ownership will not differ significantly from the current situation due to emphasis on land exchanges. In an exchange, the land values traded will be equal though actual acreage may differ.

A large-scale, rapid, land tenure adjustment program is unlikely.

The disposal of Federal surface acres with retention of the mineral estate will increase split estate management. However, state surface land with Federal minerals will be a high priority for exchanges in order to minimize the split estate acreage.

### MINERAL AND ENERGY RESOURCES

#### Oil and Gas Leasing

Table 2-2 lists federal mineral acreage proposed for No Surface Occupancy (NSO) stipulations within areas categorized as having high or moderate potential for oil or gas development. Known geologic structures (KGS) have "high" potential, while all other lands have "moderate" potential (see FEIS Appendix E for impact analysis by Special Management Area).

Lands where fluid minerals development will be subject to NSO stipulations will affect a total of 43,417 acres of federal mineral estate (see Table 2-2).

The specific areas affected by seasonal or other restrictions are listed in Table 2-4 and Appendix E maps.

The federal mineral estate that will be available for oil and gas leasing and development under standard terms and conditions will total approximately 2,117,932 acres, or 77.9 percent of the Resource Area.

#### Non-Energy Leasables

##### Potash

The proposed plan will not significantly affect potash leasing and development. The Special Management Areas proposed to be closed to nonenergy minerals leasing and special surface protection stipulations will not apply to existing potash leases. The minor constraints resulting from mitigation measures to protect other resources may limit timing, location or extent of core drilling, or other development activity, but will not prevent leased potash from being extracted.

##### Other Non-Energy Leasables

Existing sulfur prospecting permits will not be affected.

Guano and high-grade gypsum will not be able to be developed in cave resource areas totalling 6,120 acres. This will not affect the current situation. Sodium or brine production will not be significantly affected.

No data is available to indicate minable deposits affected by closures to nonenergy mineral leasing. Therefore, estimates of minerals foregone cannot be determined.

#### Mineral Materials

Salable mineral materials such as caliche, sand, and gravel will be unavailable for extraction in 16 Special Management Areas and 4 existing withdrawals totalling 61,371 acres.

Sand, gravel, and quarry rock are abundant, and no significant impacts are anticipated due to implementation of closures or other constraints in proposed SMAs.



TABLE 4-1  
IMPACTS FROM ACQUISITION

Positive	Negative
Improves resource values of existing public land.	Can displace existing authorized users if their use conflicts with management plans for the area.
Can provide improved public access to important resource values.	Removes land from the property tax base.
Improves manageability of existing public land by eliminating private inholdings with potential for conflicting uses.	Substantial costs in processing cases.
Creates more manageable land ownership patterns.	
Improved manageability can decrease administrative costs.	

TABLE 4-2  
IMPACTS FROM SALE

Positive	Negative
Potential for placing land in a higher use such as agricultural, commercial, or residential.	Potential loss of resource values, primarily wildlife and recreation.
One time payment to treasury.	Loss of future revenues from land use authorizations.
Decreased management costs for the BLM.	Increase in property taxes for person who purchases public land.
Could relieve current user of user fees.	Loss of future exchange potential as disposable tracts are depleted.
Can be used to solve existing unauthorized uses.	Possible loss of Payments in Lieu of Taxes (PILT).
Can provide additional land for residential development in urban areas.	Potential economic strains on person who currently uses land but cannot afford to purchase it.
Opportunity for ranchers to consolidate their holdings.	Possible additional encumbrance and development costs for mineral right holders as a result from split estate.
	Loss of future open space and parkland which could be conveyed under the R&PP Act in urban areas.

TABLE 4-3  
IMPACTS FROM EXCHANGE

Positive	Negative
Opportunity to consolidate land ownership patterns and reduce management costs.	High cost of processing case work.
Land exchanges would result in increased resource values.	Possible creation of split estate.
No significant reduction in net federal land acreage	No payment to U.S. Treasury.
Land transfers can take place without the burden of purchase price on the non-Federal recipient.	



## Locatable Minerals

Although withdrawals from mining claim location would be imposed on an additional 11,759 acres, impacts should be minimal as these areas are not believed to contain valuable locatable mineral deposits.

## RANGELAND RESOURCES

### Soil and Water

Increased erosion, compaction, and loss of soil fertility will continue due to oil and gas development. Most of the locations approved for oil and gas facilities will continue to be surfaced with caliche. Drilling pits will continue to be utilized. Inadequately maintained roads and pads are likely to be susceptible to erosion and become sources of sedimentation. Soils will continue to suffer a long-term loss of productivity due to these activities. Reclamation is rarely fully successful in these areas due to the infertile caliche material and high salt content.

Public land will continue to be used for disposal pits for produced water. Salt water and hydrocarbon leaks will continue to reduce soil productivity, and could affect surface and groundwater quality. Not allowing produced water disposal pits west of the Pecos River and in some of the SMAs east of the river will protect these areas from those adverse impacts.

The 43,417 acres in SMAs will be protected by NSO stipulations from the increased surface disturbance, erosion, and loss of soil fertility. Springs, riparian habitat, Pecos River/Canyons Complex, and the Yeso Hills RNA will be protected from these adverse impacts.

The impact to soil and water of avoiding drilling, storage, and production facilities within 100-year floodplains is difficult to quantify since development near draws is avoided according to existing policy. There are about 7,300 acres of 100-year floodplains, including the Pecos River floodplain. Spills or discharges from drilling facilities are possible. Surface disturbance caused by construction of drilling pads and roads will

still occur if there were no reasonable alternative to drilling in the floodplain.

Most of the CRA will continue to be open for solid minerals exploration, which could cause some increased erosion and sedimentation. This increase will result from blading roads and building drill pads. About 44,000 acres in SMAs will be protected from increased erosion due to restrictions on surface disturbance from solid leasable activities. Potential surface disturbance and resulting sedimentation due to sulfur exploration will be decreased at four springs.

The 640-acre Yeso Hills RNA will be removed from any surface disturbing activities.

Runoff from tailings and other waste disposal will continue to cause a loss of soil fertility in the potash area. There will be continued local deterioration of groundwater quality due to potash refinery waste disposal, although the groundwater in this area is not potable.

The springs riparian habitat will be protected against increased sedimentation due to the lack of mining claim activity. Fragile soils in the Pecos River/Canyons Complex and the Yeso Hills RNA will be protected.

Impacts from mineral material sales will continue. The numerous material pits cause increased erosion sedimentation and loss of soil productivity. These impacts are reduced after successful reclamation. Most SMAs will be protected by a prohibition of new mineral material pits in these areas.

Most of the CRA will continue to be impacted by extensive ORV and geophysical exploration. These uses cause soil compaction and contribute to accelerated erosion and sedimentation. Limiting or closing ORV use will reduce erosion, compaction, and sedimentation, especially on fragile soils in Yeso Hills, Maroon Cliffs, Seven Rivers Hills, and Pierce Canyon. The southern gypsum soil area will particularly benefit from the limited designation due to sparse vegetative cover which, if destroyed, results in high wind and water erosion and increased sedimentation. Reduced sedimentation in both the short and long terms into the Springs Riparian Habitat areas



will result from closing those areas to ORV use. Designating rights-of-way avoidance areas will allow for greater avoidance of fragile erodible soils and sensitive surface water.

Restricted surface disturbance on 536,804 acres in the CRA will allow for better management of these areas to reduce erosion and sedimentation, and protect water quality. Fragile soils at Maroon Cliffs, Yeso Hills, and the Pecos River/Canyons Complex will particularly benefit as will water quality in the Springs Riparian Habitat areas.

Vegetation treatments and grazing systems on I category allotments will tend to reduce erosion and sedimentation. In areas proposed for no grazing, increased ground cover will result in decreased erosion and sedimentation. This will be true for fragile soils in the Pecos River/Canyons Complex SMA and the Yeso Hills RNA. Decreased sedimentation as a result of no grazing will also improve water quality in Springs Riparian Habitat areas in both the short and long terms.

#### Vegetation

The only significant short-term impacts that will occur are increases in the vigor of preferred forage plants, where initial livestock reductions will result in lowered levels of utilization.

The long-term impact will be an increase in production and cover of desirable forage species. Proper management, which provides for rest during critical periods of plant growth, leads to an increase in desirable plant species composition. Reduced grazing pressure will increase plant vigor, leading to increased seed production and revegetation by seedlings, rhizomes, and stolons. If these desirable plants are the climax species, they will outcompete the lower value species and reinvade the site (Stoddart et al. 1975).

Vegetation condition will improve to 13,000 acres in excellent condition, 689,000 acres in good condition, 220,000 acres in fair condition, and 1,000 acres in poor condition.

The major long-term impacts to vegetation will be an improvement in the type and

productivity of forage species on sites that are currently in poor or fair condition. Under intensive management a substantial number of sites will be converted from poor to fair condition and from fair to good condition.

Proposed rangeland improvements and treatments will improve livestock distribution and could increase livestock production.

Increased vegetation densities, productivity, and available forage will result from the proposed vegetation treatments.

ORV restrictions will have both short- and long-term positive impacts to vegetation by limiting surface disturbances.

Limited fire suppression plans will affect vegetation resources in the long-term by allowing more desert shrub dominated acreage to burn naturally. This will allow the re-establishment of herbaceous vegetation over most sites.

#### Livestock Grazing

The initial reduction of 24,859 AUMs on intensively managed allotments will result in a decrease of 12 percent of the current active preference. These initial adjustments will help achieve the management actions developed for each allotment in the I Category (see Appendix D-2 of the DEIS). Appendix D-6 of the DEIS displays the recommended changes in AUMs for all allotments under Alternative C (the proposed plan).

In the long term, 225,458 AUMs will be available for livestock use (or an increase of 15 percent of the 5-year actual use). This projected increase of livestock forage is dependent on implementing grazing systems, installing rangeland improvements, and establishing vegetation treatments to increase forage productivity, improve distribution patterns, and convert potentially suitable sites to suitable sites.

The impacts to each livestock operator will vary according to how grazing use in the allotment fits into the total ranch operation.



## Wildlife Habitat

Implementation of 50 Cooperative Management Plans, Habitat Management Plans encompassing approximately 450,000 acres, 7 Areas of Critical Environmental Concern encompassing 104,390 acres, 3 Research Natural Areas encompassing 4,320 acres, and 1 Special Management Area encompassing approximately 33,200 acres will, in the long term, significantly improve the quality and diversity of overall wildlife habitat. This is especially true for wetlands, riparian communities, and game animal habitat. Big game numbers will have the potential to increase up to or greater than 9,500 mule deer and 350 pronghorn antelope with improved habitat conditions.

Impacts from the special stipulations, restrictions, and management prescriptions are cumulatively beneficial to wildlife because they reduce loss of habitat in the short and long term. Even though many areas are rehabilitated after disturbance, loss of habitat is unavoidable until the disturbed area is reclaimed.

Within the Resource Area, 4,840 acres (0.2 percent) will be removed from all uses except research.

## Threatened and Endangered Species Habitat

Threatened and Endangered Species Habitat will improve significantly in the short and long term. Active management under the proposed plan will protect and enhance habitat and greatly decrease indirect impacts of surface disturbance on Threatened and Endangered Species Habitat. The Seven River Hills and Blue Spring Areas of Critical Environmental Concern will protect and enhance habitat for the Threatened gypsum wild buckwheat and Endangered Pecos gambusia, respectively. The Little McKittrick Draw Research Natural Area will provide the opportunity to learn the biological requirements for the proposed threatened ramshorn snail while protecting one of only two known populations. The Ben Slaughter Draw and Bluntnose Shiner Special Management Areas will enhance habitat for additional populations of gypsum wild buckwheat and a portion of stream bank habitat

for the proposed Threatened bluntnose shiner. Additional State and Federal listed species habitat will be protected and enhanced through CRMPs for other SMAs or Category I allotments. Potential delisting of Federal and State listed species will be greatly enhanced through full implementation of Recovery Plans.

## SPECIAL MANAGEMENT AREAS

### Areas of Critical Environmental Concern (ACEC)

Impacts of the seven potential ACECs (Seven River Hills, Chosa Draw Caves Complex, Dark Canyon, Lonesome Ridge, Blue Spring, Los Medanos Raptor Area, and Pecos River/Canyons Complex) are addressed in general terms under other sections of this analysis, including Soil and Water, Terrestrial Habitat, Threatened and Endangered Species Habitat, Cave Resources, Visual Resources, and Cultural Resources.

### Recreation

Retaining public lands in public ownership will not affect recreation resources. Acquiring lands at Blue Springs and Chosa Draw Caves Complex will enhance opportunities for environmental interpretation and education.

Long-term adverse impacts on the diversity of recreation opportunity settings will occur in most of the CRA resulting from the gradual decrease of semiprimitive nonmotorized and semiprimitive motorized recreation opportunities. In some cases, increased road development may allow access to public land previously unavailable for dispersed recreational uses.

The NSO stipulations, a floodplain stipulation, a limited ORV designation, and closure to solid minerals leasing and mineral material disposal will help retain the important water based recreation activities and provide the recreation experience desired by most users.

About 2,990 acres of semiprimitive nonmotorized recreation opportunities will be protected in the Lonesome Ridge ACEC/ONA. About 28,250 acres of semiprimitive motorized



recreation opportunities will be protected, including the Cave Resources SRMA, Pecos River Corridor SRMA, and Dark Canyon ACEC (1.3 percent of the CRA surface).

Many of the proposed actions, including managing to protect scenic values, closure to ORV use, limiting ORV use to designated routes, closure to mining claim location, restricted geophysical exploration, NSO lease stipulations, closure to solid minerals leasing, and protection of other resource values will encourage the maintenance of these special recreation opportunities as they currently exist.

Retention of the existing natural landscape within zone 1 of the Guadalupe Escarpment Scenic Area will be a moderate positive impact by providing long-term retention of semiprimitive motorized recreation opportunities in this 8,820-acre area.

The rights-of-way avoidance areas will provide partial protection of special recreation values in 13 areas covering 16,390 acres (0.8 percent of the CRA surface).

Access to the Lonesome Ridge and Dark Canyon SMAs will enhance important recreation opportunities.

#### Off Road Vehicles

The open ORV designation covering 1,993,748 acres (91.8 percent of the CRA surface) will result in continued availability of sufficient recreational ORV use opportunities.

Closure to ORV in 6,269 acres and limiting vehicle use to designated routes (see Table 2-4) on 170,983 acres will result in minor adverse impacts by restricting recreational ORV use in these locations.

The Hackberry Lake and Alkali Lake Intensive ORV Use Areas will concentrate trail bike and other ORV use and limit deterioration of sensitive resource values elsewhere in the CRA, in both the short and long term.

#### Cave Resources

Sufficient protection will be provided for those caves within the cave resource primary

occurrence zone (387,000 acres) by having a 300-foot minimum operations distance from any known cave entrance, passage, major karst feature or blowhole, and not allowing exploration for or development of solid leasable minerals.

Establishing the 8,030-acre Cave Resource SMA (0.4 percent of the Resource Area), will sufficiently prevent direct degradation of these important intensively managed caves and cave settings. Designation of the Cave Resource SRMA (6,120 acres) will protect 14 gated caves and five ungated caves. These caves presently receive intensive management to protect their unique, fragile, and nonrenewable resource values while still allowing for appropriate recreational use. Crucial recreation settings will be retained for these major recreational caves to enhance the overall recreation experience, camping, picnicking, sightseeing, etc., associated with caving in these predominantly semiprimitive motorized recreation opportunity settings.

Acquisition of 480 acres of private land and 40 acres of mineral estate in the Chosa Draw Caves Complex ACEC will consolidate management for the complex ecosystem associated with the gypsum cave complex. Consolidating ownership will adequately protect the significant hydrologic, biologic, and geologic cave resources within this area.

Designating as National Natural Landmark the four recreational caves of the McKittrick Hills Caves Complex and Dry Cave will recognize their diverse nature and unique resource values (1,200 acres).

Honest Injun Cave, presently gated, will have adequate protection measures implemented to manage its cultural values and avoid exposing the public to potential health hazards.

#### Visual Resources

Establishing VRM class objectives for the undesignated portion of the CRA (965,000 acres) will reduce potentially excessive visual intrusions in landscapes with high scenic quality or high visual sensitivity. Some VRM classes shown on Map 3-6 of the Draft RMP were reclassified in proposed SMAs to resolve conflicts between minerals development, visual resources, and other resources.



Changing visual classes was done to facilitate management objectives of certain SMAs. However, continued minerals and other surface disturbing development activities will gradually increase the visual contrasts and reduce the visual qualities of the existing landscape throughout the CRA.

Scenic quality and visual sensitivity are emphasized in the Lonesome Ridge ACEC/ONA (2,990 acres), Dark Canyon ACEC (3,950 acres), Pecos River/ Canyons Complex ACEC (5,190 acres), most of the management units of the Cave Resource SRMA (6,120 acres), and the Guadalupe Escarpment Scenic Area (49,570 acres). The quality of recreation experiences will be enhanced or improved for most of these areas and zone 1 (8,820 acres) of the Guadalupe Escarpment Scenic Area by allowing only low levels of visual contrast of any surface disturbing activities.

Zone 2 (40,750 acres) of the Guadalupe Escarpment Scenic Area will be managed under VRM Class III objectives. This will permit some modification of the characteristic landscape of this visually sensitive area by allowing moderate visual contrasts to occur.

SMAs which restrict or prohibit intensive resource development will have a high positive impact by reducing the degree of adverse visual contrasts on the existing landscape. Continued minerals and associated rights-of-way development throughout the remainder of the CRA will result in continued varying degrees of visual contrasts on the characteristic landscape.

Limiting oil and gas production facilities within the 100-year floodplain will be a generally moderate positive impact to visual resources along the Pecos River and other major drainages. This action will result in negligible change to visual resources elsewhere in the CRA where resource development activities occur.

Vegetation treatments and other rangeland improvements on 62,000 acres will produce moderate short-term adverse impacts on visual quality.

Limited fire suppression will benefit visual resources in the long term for most SMAs by

avoiding surface damages caused by full suppression practices. Short-term impacts will be similar to those of vegetation treatment.

Important visual resources will be protected by establishing 14 rights-of-way avoidance areas totalling 35,051 acres. This will be a high positive impact for higher scenic quality or sensitive visual resources within these areas.

### Cultural Resources

Continued oil and gas lease development will provide basic survey information for cultural resources. Properly implemented data recovery plans for significant cultural resources, developed in those cases where adverse impacts are unavoidable, can provide valuable new information for cultural resources.

A few lease operations are under special surface disturbance stipulations which enhance the preservation of cultural resources. NSO stipulations on oil and gas leasing will protect affected areas from some disturbances. Even though most lease operations are implemented to avoid "direct impact" to cultural resources, lease development often leads to a cumulative adverse impact. The sources of these cumulative effects are as follows:

Increased access promotes increased unauthorized collection of cultural materials.

Lease development activities tend to destabilize sand dune surfaces, thus degrading the environmental context of cultural sites located in dunal environments. When 40-acre well spacings are used in lease development, the general degradation of environmental context is acute.

Continued restrictions on oil and gas drilling within known economic potash reserves will moderate the surface disturbance which normally accompanies oil and gas development. This protects the integrity of cultural resources on the surface. Surface disturbance arising from potash surface operations will continue to be mitigated as required by law and BLM policy.



In site areas within the Laguna Plata Archaeological District, surface disturbance restrictions have been placed on some potash leases. These restrictions protect some cultural resources from adverse impacts from potash development.

"Restricted surface disturbance," as it relates to cultural resources, is defined as follows:

No surface disturbance will be permitted until a representative sample of cultural materials is excavated from the affected site. Further, surface disturbance activities will be restricted and confined so as to minimize or avoid cumulative indirect effects on cultural resources in this area.

Slow subsidence of mined-out areas will alter the angle and direction of slopes within the subsidence areas. This change in overall land form shape may have a long-term cumulative impact on the integrity of cultural resource sites.

The impacts of material sales on cultural resources will continue to be mitigated as required by law and BLM policy; however, the lack of monitoring on material pits will continue to produce residual impacts to cultural resources.

The direct impacts of locatable mineral exploration and development will be mitigated by Federal law and BLM policies.

The Department of Energy (DOE) management of the Waste Isolation Pilot Plant Project (WIPP) and the Gnome sites will not permit mineral extraction related surface disturbances; therefore, the preservation of cultural resources will be enhanced in these two withdrawn areas.

Rangeland management has little effect on cultural resources because surface disturbing projects are conducted in compliance with Federal laws and policies. Two exceptions to this assessment are vegetation treatments and the use of intensive grazing systems.

Vegetation treatments may affect cultural resources by contaminating the radiocarbon

samples from sprayed hydrocarbons and hydrocarbon derivatives, and by increasing short-term erosion which may disturb the integrity of buried cultural deposits.

The use of intensive grazing systems may affect cultural resources by excessive trampling by large numbers of animals.

Full fire suppression on, or near, historic or prehistoric sites may disturb some or all of the site's depositional integrity.

SMAs are usually protective of the cultural resources within its boundaries. This is because SMAs normally restrict access and/or surface disturbance to protect recognized resource values. Seven SMAs (17,028 acres) will be established specifically to protect cultural resources.

Closed ORV designations help protect cultural resources by restricting access, which discourages unauthorized collection and by preventing ORV disturbance of cultural deposits. ORV closures have been placed on Laguna Plata, Pope's Well, and Pierce Canyon.

Limited ORV designations have the same benefits to cultural resources as closed designations, but to a more limited extent, because existing roads and trails usually remain open which improves opportunities for site impacts through unauthorized use. Of the proposed limited ORV designations, the restrictions placed on Maroon Cliffs, Bear Grass Draw, Poco Site, and the Potash Bull Wheel are specifically protective of cultural resources while permitting controlled recreational use of the area.

Open ORV designations have significant adverse impacts to cultural resources depending on the fragility of the soil. Open ORV designations also provide greater access for unauthorized artifact collectors.

The plan may have adverse impacts to cultural sites due to off-road use, which leads to increases in vandalism, site erosion, and surface disturbance. Increased access will accelerate these impacts, especially in areas which are not protected by ORV designations or rough terrain. Cultural Resource Management Plans (CRMPs) and ORV management will



benefit cultural sites by increasing public awareness and minimizing visitor impacts to sites. In addition, the proposed monitoring plan will allow BLM to realistically assess the impacts of ORV use in CRA and apply protective limitations or closures where needed.

Some specific land acquisitions are proposed which will affect cultural resources. the protective management of cultural resources in Laguna Plata, the Pecos River/Canyons Complex, Chosa Draw, and Blue Spring will be enhanced by the acquisition of State and private land.

#### Paleontological Resources

Designation of Dry Cave as a 420-acre RNA will be positive in the short and long term. The cave will remain gated and entry restricted for authorized research and education. The size of the RNA will allow for continued exploration of cave passages while ensuring sufficient protection of the cave from adverse impacts.

#### Rights-of-way

##### Corridors

Continued management of right-of-way corridors will reduce the amount of surface disturbance

resulting from facility construction. Simplified application processing and environmental analysis will reduce costs to applicants where existing corridors can be used in the future for compatible facilities.

##### Avoidance Areas

Proposed avoidance areas in 14 Special Management Areas totalling 35,051 acres will prevent construction through those areas and require rights-of-way applicants to use alternative routes. No known projects are proposed, and no significant impacts are expected.

##### ACCESS

Access will be obtained to allow for increased public use, and to meet BLM administrative needs in 6 high priority, 11 moderate, and 8 low priority access tracts. This will help resolve access problems in the CRA, which will reduce user complaints and increase efficiency in managing public lands.

Access restrictions to benefit other resource values in 22 access tracts would occur under the proposed action. Access related impacts would be prevented which would result in the retention of other resource values.



## CHAPTER 5

# CONSULTATION AND COORDINATION





## INTRODUCTION

This chapter summarizes the public participation, consultation, and coordination conducted in preparing the Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) and Final RMP/EIS. Public comments on the Draft RMP/EIS and BLM responses to the comments are included in this chapter as part of this process.

In the course of preparing these documents, formal and informal efforts have been made to involve the public, other Federal agencies, and State and local governments in the planning process. Several points of public involvement are mandated by regulations and were complied with, but numerous other actions were taken to further involve the public. The RMP/EIS was prepared by an interdisciplinary team of resource specialists from BLM's Carlsbad Resource Area and the Roswell District. A list of persons involved in preparation of the RMP/EIS is provided in Table 5-1.

## CONSISTENCY WITH OTHER PLANS

BLM planning regulations require that RMPs be "...consistent with officially approved or adopted resource related plans and the policies and programs contained therein of other Federal agencies, State and local governments, and Indian tribes, so long as the guidance and resource management plans are also consistent with the purposes, policies and programs of Federal laws and regulations applicable to public land..." (43 CFR 1610.3).

At this time there are no known inconsistencies between any of the alternatives and officially approved and adopted resource related policies or programs of other Federal agencies, State and local governments and Indian tribes.

## PUBLIC PARTICIPATION

Public participation in the Carlsbad RMP is a dynamic process occurring throughout the development of the plan and beyond. Table 5-2 outlines the future formal public participation process by action item. In addition

to formal public participation steps, informal contacts occur frequently with public land users and interested publics through meetings, field trips, telephone calls or letters. All applicable public participation is documented and analyzed in the planning process, and is kept on file in the CRA.

**Scoping:** Preplanning efforts for the Carlsbad RMP included correspondence, informal consultations, and meetings with livestock grazing permittees to establish range inventory procedures and to initiate selective management categorization. In November 1983 BLM published a Notice of Intent (NOI) in the Federal Register announcing a 60-day public involvement period (December 1983 to January 1984) to gather input on possible land use issues to be considered in the Carlsbad RMP.

Brochures outlining the planning process, along with response forms for input on RMP issues, were mailed to a list of over 700 addressees. A series of six public meetings were held in Artesia, Hope and Carlsbad in December 1983. During issue identification, news releases were also sent to over 50 newspapers and radio and television stations in New Mexico and west Texas.

Responses received from the meeting attendees and returned by mail helped to solidify the RMP's issues and focus the planning analysis on the unresolved land use allocation questions. After the final issues were identified, they were mailed out along with Draft Planning Criteria to an updated list of other agencies, businesses, organizations and individuals interested in management of the public lands in the CRA. Requests for ACEC nominations were also sent at the same time. In May 1984, another 30-day public comment period on the Draft Planning Criteria resulted in substantive input to BLM managers which helped develop the decision needs, criteria for formulating alternatives, and directions to the interdisciplinary team.

The Draft RMP/EIS (DEIS) was mailed out on March 9, 1986, to a mailing list of 688 people. Additional copies were made available to other members of the public requesting copies. Due to high public demand for the DEIS, an additional 250 copies have been printed in conjunction with printing of the



TABLE 5-1  
LIST OF PREPARERS

Name	RMP Responsibility	Education	Experience
<u>INTERDISCIPLINARY TEAM</u>			
Scott Adams	Coordination Support	U.S. Conservation & Resource Planning University of Michigan	BLM 11 yrs. - Multi Resource Staff Chief - Community Planner - Outdoor Recreation Planner
Robert L. Alward	Recreation ORV VRM Wilderness	B.S., Wildlife Management Humboldt State University	BLM, 9 yrs. - Outdoor Recreation Planner (ORP) - Recreation Technician National Park Service, 4 yrs. - Interpretation/ Resource Protection Ranger
Linda C. Brett	Cultural Resources Paleontology	B.S., Biology University of New Mexico  M.A., Anthropology Eastern New Mexico University	BLM 2 yrs. - Archeologist  Eastern NM University, 3 yrs. - Cultural Resource Management  Eastern NM University, 3 yrs. - Archaeological Research
Michael C. Bunker	Access	B.S. Forest Management Utah State University	BLM, 12 yrs. - District ORP - Resource Area ORP - Natural Resource Specialist - Range Technician
Frank D'Amore	RMP/EIS Team Leader	B.S., Natural Resource Management Graduate Study, Regional Planning University of Nevada, Reno	BLM, 12 yrs - EIS Team Leader - Planning Coordinator - Outdoor Recreation Planner
James R. Goodbar	Lands Realty Rights-of-Way Cave Resources	B.S., Park & Recreation Management Texas A&M  Graduate Study, Physical Geography Western Kentucky University	BLM, 6 yrs. - Realty Specialist - Cave Specialist - Recreation Technician
Jesse J. Juen	Wildlife Habitat Threatened & Endangered Species Habitat	B.S., Wildlife & Fisheries Sciences Texas A&M University M.S., Wildlife Management Texas Tech University	BLM, 5 yrs. - Wildlife Management Biologist - Threatened & Endangered Species Specialist USDA Forest Service, 1 yr. - Wildlife Research Biologist Texas Tech University, 2 yrs. - Wildlife Research Association



TABLE 5-1 (continued)  
LIST OF PREPARERS

Name	RMP Responsibility	Education	Experience
Pat Kelley	Planning Coordination	B.S., Agriculture University of California, Chico	BLM 6 yrs. - Planning Coordinator - Environmental Coordinator - Range Conservationist
John C. Novosad	Soil Air Water	B.S., Biology University of Rhode Island  M.S., Natural & Environmental Res. University of New Hampshire	Forest Service 4 yrs. - Forest Planner BLM, 8 yrs. - Environmental Protection Specialist - Physical Scientist - Soil Scientist
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Gerald W. Queen	Geology Minerals and Energy Resources	B.A., Earth Science (Geology) Chadron State College	BLM, 2 yrs. - Geologist
Edwin J. Singleton	Subsurface Management Fire Vegetation Livestock Management	B.S., Range Management New Mexico State University  M.A., Range Management Texas Tech University	BLM, 8 yrs. - Range Conservationist  Forest Service, 3 yrs. - Range Conservationist

TABLE 5-1 (concluded)  
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Terry Keim - Illustration  
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Judy Yslas - Word Processing  
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Ralph Sena - Planning Coordination  
Joe Sovcik - ACEC  
Jay Thietten - Fire Management  
Jerry Townsend - Range Management  
Max Ogg - Access



Final RMP/EIS (FEIS). Two open house presentations and question and answer sessions with BLM resource specialists were held in the afternoon and evening of May 1, 1986. On May 7, 1986, two formal hearings were held in the afternoon and evening to receive testimony from all interested persons and organizations. The 90-day written comment period for the DEIS ended on June 9, 1986, with a total of 58 letters received. Based on written comments as well as oral comments at the public hearings, the DEIS was revised and published as the FEIS.

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Bureau of Land Management  
18th and C Streets, NW  
Washington, D.C. 20240

The Director will render a prompt written decision on the protest, setting forth the reasons for the decision. The decision will be sent to the protesting party by certified mail and will be the final decision of the Department of the Interior.

#### RECORD OF DECISION

The Carlsbad RMP will be approved no earlier than thirty days after publication by the EPA in the Federal Register of the notice of receipt of the Proposed RMP and Final EIS. The approval of the Plan will be documented in a Record of Decisions which will be available for public review. Approval will be withheld on any portion of the Plan protested until final action has been completed on the protests.

#### PROTEST PROCEDURES

Any person who participated in the planning process and has an interest that is or may be adversely affected by approval of the Proposed RMP may file a written protest with the Director of the BLM within 30 days of the date the EPA publishes the notice of receipt of the Proposed RMP and Final EIS in the Federal Register.

The protest must contain the name, mailing address, telephone number, and interest of the person filing the protest; a statement of the issues being protested, raising only those issues that were submitted for the record during the planning process; a statement of the parts of the plan being protested; copies of all documents addressing the issues submitted during the planning process by the protesting party, or an indication of the date the issues were discussed for the record; and a concise statement explaining why the State Director's decision is believed to be wrong. Any protests should be sent to the Director of the BLM at the following address:

#### CONTINUING PUBLIC PARTICIPATION

The Carlsbad Resource Area will prepare an RMP summary update every year. The purpose of this summary will be to inform the public of the progress made in implementing the RMP. The summary will also describe the activity plans to be prepared the following year so interested members of the public can request copies and comment. The BLM hopes that this will enable the public to be involved in the specific land management actions resulting from implementation of this RMP.

#### PUBLIC INPUT ANALYSIS

During the comment period, 2 hearings were held and 22 persons provided comments. In addition, 58 letters were received during the comment period. The major concerns expressed were in the following areas; Economics, Alternatives, Lack of Input from the Mineral/Energy and Ranching Industries, and Restrictions in SMAs.

##### Economics

Both the ranching and minerals/energy industries commented critically of the economic analysis in the RMP/EIS. The ranching industry felt that the ranch budgets were not realistic and were not representative of that sector. The mineral and energy industry felt that the impacts upon the economy caused by implementing any of the alternatives had not been adequately addressed.

TABLE 5-2  
CARLSBAD RMP/EIS PUBLIC INVOLVEMENT ACTIONS

08-27-86	Advance copy of plan/FEIS to Governor; begin 60-day review by State
09-25-86	File FEIS with EPA; begin 30-day protest period
10-24-86	Deadline for Governor's review
10-24-86	Deadline for protest to Director, BLM
11-06-86	Publish Governor's recommendations, if not raised previously - 30-day public review
12-06-86	End public review of Governor's recommendations
12-06-86	Deadline to complete protest resolution
01-06-87	State Director responds to Governor
01-06-87	Public review of changes due to protest (if significant) begin
02-06-87	Public review of changes due to protest (if significant) ends
02-06-87	End Governor's appeal period to Director



## ALTERNATIVES

### Alternative A

Of those responding, approximately 25 percent preferred alternative A. Additionally, several respondents did not feel adequate analysis was presented in the EIS to show why current management needs to be changed.

### Alternative B

In general, approximately 10 percent of respondents favored Alternative B while approximately 12 percent opposed Alternative B. Minerals/Energy industry felt that Alternative B was not a "production alternative" and was overly restrictive.

### Alternative C

Approximately 9 percent of respondents were opposed to Alternative C while 12 percent favored Alternative C.

### Alternative D

Ten percent of the respondents favored Alternative D while approximately eight percent opposed Alternative D.

### Alternative D1

The major comment on Alternative D1 was that it was an unreasonable alternative that contained many erroneous assumptions.

### Alternatives in General

Several respondents felt that the range of alternatives was insufficient and that all of the proposed alternatives were too restrictive and antiproduction.

### Lack of Input From Minerals/Energy and Ranching Industries

There was a high level of concern expressed that these two industries had not been adequately coordinated with during the

planning process. Representatives stated that had the BLM actively coordinated with these two groups, the alternatives would have been more appropriate.

### Restrictions in SMAs

Much of the response from the minerals and energy industries concerned the restrictions placed in the Special Management Areas. No surface occupancy, not open for leasing, and no geophysical exploration were the most discussed restrictions. The Los Medanos raptor stipulations were of particular concern.





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CENTRAL NEW MEXICO  
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ROCKY MTN. NATURAL  
PUBLIC LANDS & ENERGY DIVISION  
WANDA SHETRONE  
EL PASO GROUP  
ALBUQUERQUE GROUP  
DEBBIE SEASE  
ROGER D. STEED  
WILBURN D. CUNNINGHAM  
WILLIAM W. DUMMIRE  
JOHN EGBERT  
SIERRA CLUB  
TERRY SOPHER  
BOB BURNETT  
LEO QUITRERG  
THOMAS THORTON

EXECUTIVE DIRECTOR

INDUSTRIAL ORGANIZATIONS

MINERALS EXPLORATION COALITION

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INDUSTRIAL ORGANIZATIONS

NM OIL & GAS ASSOC.  
NM PUBLIC LANDS COMMITTEE

FRED SCHLICHER

INDIVIDUALS

MR. JOHN C. ACKLEN  
J. B. ADAMSON  
DON ANGLE  
CARL BAXLEY  
JAMES D. BEARD  
BOB BROWN  
MR. ED L. BUCK  
DOUG BURGUR  
JOHN BURLESON  
CHARLES R. CAMPBELL  
E. B. CLARK  
EVELYN D. COOKSEY  
ARTHUR B. CUMMINGS  
FRANK S. CHIK  
RICHARD DISTARDING  
ZANE DOHNER  
J. W. DYER, SR.  
GEORGE EARLY  
ARLEN I. EDGAR  
PETER FEBBRORIELLO  
TERRY W. FRANKLIN  
L. R. FRENCH JR.  
JOHN GEDDIE  
CARL GEORGE  
TERRY J. HARTMAN  
R. HAWORTH  
MARK HENDERSON  
FRED N. HIGGINS  
THORTON HOOPER  
MILTON HUGHES  
MARK HUGHES  
STEPHEN K. IRELAND  
TIM KEARNS  
DAVID KINCAID



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INDIVIDUALS

GENE KINCAID  
DAVID T. KIRKPATRICK  
LEO W. KOENIG  
ROBERT E. LANDRETH  
C. E. LONG  
C. E. LONG  
JOHN MAGRAW  
JOHN G. MARR  
MR. RAYMOND McLAREN  
ROY L. McCAY  
LANCE McCOLD  
MARGRET E. MERRITT  
GEORGE H. MITCHELL  
JAMES MOUTRAY  
EARL NELLER  
RALPH NIX  
GRETCHEN ORENAUF  
DONALD F. ODEN  
KERRY OLSON  
RONDA OWENS  
FRED E. PADILLA  
MARJORIE M. SCHWEITZER  
JAMES SHIELDS  
RICHARD SLACK  
JAMES T. SMITH  
C. E. STADLER  
C. W. STRUMHOFFER  
LEO SUTTEN  
BOB SWAYZE  
HARRY E. WILSON  
DR. WILLIAM METZ

ARGONNE NATIONAL LAB  
BILL J. GRAHAM ESTATE  
CAMPRELL & HENDRICK  
DESERT RESEARCH INSTITUTE  
EL PASO TIMES  
FRANKLIN, ASTON & FAIR INC.  
GIFFORD, MITCHELL & WISENBAKER  
GRAUTEN & PEPER  
LAB OF ANTHROPOLOGY  
LOCO HILLS FIRE DEPT.

PATRICIA A. HICKS  
MARILYN HADDRIE

MORTON M. PEPPER  
CURTIS F. SCHRAFSMA  
R. N. WISEMAN  
HAROLD L. HANNAH

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INDIVIDUALS

NIKENS & ASSOCIATES  
ROBERT L. PARKER TRUST  
SW RESEARCH & INFO CTR  
WESTINGHOUSE

PAUL NIKENS  
DON R. HANCOCK  
BOB KEHRMAN

LIVESTOCK RELATED ORGANIZATIONS

NM BEEF COUNCIL  
NM FARM & LIVESTOCK BUREAU  
NM WOOL GROWERS INC.  
PUBLIC LANDS COUNCIL  
RANGE IMPROVEMENT TASK FORCE

RICK SHAW  
D.J. PORTER  
NATIONAL CATTLEMAN'S ASSOC.  
DR. V.W. HOWARD JR.  
DR. JAMES F. KNIGHT  
KIRK MCDANIEL  
JERRY G. SCHICKEDANZ  
BUD EFFERS  
BOB JONES

SE NEW MEXICO GRAZING ASSOC.

SOCIETY FOR RANGE MANAGEMENT

MINERAL AND ENERGY INTERESTS

JULIAN ARD  
DELMER W. BERRY  
ROBERT BOLING  
GEORGE CHASE  
CLIFFORD CONE  
WILLIAM P. DOOLEY  
ROBERT N. ENFIELD  
CARL ENGWELL  
DAVID FASKEN  
GEORGE E FETTINGER  
C. O. FULTON  
CURTIS HARKAMER  
ROGER C. HANKS  
DOYLE HARTMAN  
PAUL HEGWAR  
TOM L. INGRAM



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MINERAL AND ENERGY INTERESTS

ABO PETROLEUM CORP.  
ACE OIL CO.  
ACHEN OIL & GAS CO.  
ADAMS EXPLORATION CO.  
ADOBE EXPLORATION CO.  
AGUA INC.  
ALPHA 21 PRODUCTION CO.  
ALPINE PETROLEUM CORP.  
AMAX  
AMAX EXPLORATION  
AMCO PRODUCTION CO.  
AMERADA HESS  
  
AMERICAN OIL CO.  
AMERICAN PETROFINA CO. OF TEX.  
AMERICAN QUASAR PETROLEUM CO.  
AMERICAN TRADING & PRODUCTION  
AMINOIL USA INC.

CURTIS INMAN  
JAMES T. JENNINGS  
HOMER J. KYLE  
HERMAN J. LEDBETTER  
W. H. MCKINLEY  
BILL L. MILLER  
WAYNE MOORE  
FRED POOL, JR.  
HARRY PTASYSKI  
GEORGE D. RIGGS  
CARL A. SCHELLINGER  
JOHN R. SEAY  
J. G. SELL  
S. G. SELL  
C. E. STAPLES  
J. RAY STEWART  
J. CLEO THOMPSON  
C. W. TRAINER  
J. M. WELCH  
MILTON WESSELS  
V. H. WESTBROOK  
J.C. WILLIAMSON  
JOHN YURONKA

JIM ARROTT

BOB KIRBY  
LAURIE CHRISTENSON

WILLIAM S. PRICE

JESS B. NUNNELER

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MINERAL AND ENERGY INTERESTS

AMMEX PETROLEUM CO.	
AMOCO PRODUCTION CO.	ROBERTA L. ANDERSEN PETE MCRAE
ANADARKO PRODUCTION CO.	
ANTWEIL OIL CO.	MORRIS R. ANTWEIL
APACHE CORP.	
APOLLO ENERGY INC.	
ARROWHEAD OIL CORP.	
ASSOC. OF MOUNTAIN STATES	INDEPEND. PETROLEUM OPERATORS
ATLANTIC RICHFIELD	KATHRYN DICKENS JACK MCCARTHY
AUSTIN GAS PURCHASING INC.	
B & E INC.	PHIL WITHROW
B & J PRODUCTION	
BABER WELL SERVICING CO.	
BARBER OIL INC.	ROBERT S. LIGHT
BASS ENTERPRISES PROD. CO.	J.E. PULLIG
BEACH EXPLORATION INC.	CARL C. BEACH WILLIAM N. BEACH WILLIAM M. BEARD
BEARD OIL CO.	
BEL DYN INC.	
BELCO DEVELOPMENT CORP.	
BELCO PETROLEUM CORP.	
BELNORTH PETROLEUM CORP.	
BELRING	
BHP PETROLEUM (AMERICAS) INC.	
BILL G. ISLER OIL CO.	BILL G. ISLER
BLISS PETROLEUM INC.	PAUL D. BLISS
BOYD OPERATING CO.	TOM M. BOYD
BRAVO ENERGY INC.	
BRAZOS PETROLEUM CO.	
BRECK OPERATING CORP.	FRED F. DIESER
BROOM TRANSPORTATION CO.	
BTA OIL PRODUCERS	
BURK ROYALTY CO.	FRED M. LYNCH
BURKSON & HUFF	
BURNETT OIL CO. INC.	RAYFORD STARKEY
C & K PETROLEUM INC.	
C&C OPERATING CORP.	JOE A. COLEMAN
CARTER & SON OILFIELD TRANS	
CARTER FOUNDATION PROD.	



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MINERAL AND ENERGY INTERESTS

CHALLENGER ENERGY INC.  
CHAMPLIN PETROLEUM CO.

JAMES M. TAYLOR

CHAUVERON OPERATING CO.  
CHEVRON USA INC.  
CIBOLA ENERGY CORP.  
CIMARRON ENERGY CORP.  
CITIES SERVICE OIL CO.  
CLIFFS DRILLING CO.  
COASTAL OIL & GAS CORP.  
COLEMAN OIL & GAS INC.  
COLLIER & COLLIER  
COLLIER ENERGY INC.  
CONOCO INC.

ELMER W. STARTZ

GEORGE E. COLEMAN

CHRIS FUIING  
HUGH A. INGRAM

CONQUEST EXPLORATION CO.  
CONSOLIDATION COAL CO.  
CONTINENTAL GROUP INC.  
CONVEST ENERGY CO.

KENT M. READING

COQUINA OIL CORP.  
CROWN CENTRAL PETROLEUM  
CULBERSON & IRWIN  
DALPORT OIL CORP.  
DAMSON OIL CO.  
DELTA US CORP.  
DENTON OIL CO.

KEVIN MCCARTHY

LEON M. LAMPERT

DEPCO INC.  
DESANA CORP.

LANDS DEPT.

DIAMONDBACK PETROLEUM INC.  
DINERO OPERATING CO.  
DISCOVERY OPERATING INC.  
DIXON & YATES OIL CO.  
DMR PETROLEUM

LAVONDA NORMAN

DORCHESTER EXPLORATION INC.  
DUNIGAN OPERATING CO. INC.  
DURHAM INC.

KEVIN D. DURHAM

DYAD ASSOCIATES  
DYCO PETROLEUM CORP.  
EAGLE OIL & GAS CO.  
ECHO PRODUCTION INC.  
EL PASO EXPLORATION CO.

WARREN T. AYRES

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MINERAL AND ENERGY INTERESTS

EI. PASO NATURAL GAS CO.	JAMES F. GEORGE
EL RAN INC.	JOHN A. SPROUL
ELLIOTT OIL CO.	ROBERT R. RANCK
EMCOR PETROLEUM INC.	
ENERGY RESERVER GROUP INC.	
ENERGY RESOURCES OIL & GAS CO	
ENSOURCE INC.	
ENSTAR PETROLEUM CO.	LOUIS S. TORRANS JR.
ENSTAR PETROLEUM INC.	
EQUITABLE PETROLEUM CORP.	
ESPERANZA ENERGY CORP.	
ESTORIL PRODUCING CORP.	
EXXON CORP.	MELBA C. KNIPLING
FIRO CORP.	TOMMY L. McDONALD
FLAG REDFERN OIL CO.	
FLAGSTONE PETROLEUM CORP.	
FLORIDA EXPLORATION CO.	
FORD-CHAPMAN & ASSOC.	
FOREE COMPANY	R.L. FOREE
FORISTER PUMPING SERVICE	
FORISTER-SWEATT OIL CO.	
FRANKS PETROLEUM INC.	
FRASER INDUSTRIES, INC.	
FROSTMAN OIL CORP.	
FULLER PETROLEUM INC.	C. W. DOWNEY JR.
GAELIC PETROLEUM CO.	
GARRETT ENERGY	
GAS LIFT SALES & SERVICE INC.	
GENERAL OPERATING CO.	
GETTY OIL CO.	HARVEY O. WOODS JR.
GLOBE CONSTRUCTION	
GMC CO.	
GRACE ENERGY	
GREAT WESTERN DRILL CO.	PAT L. SHANAHAN
GRSJ PETROLEUM	
GSI	
GULF OIL CORP.	DR. DAVID R. LEMASTER
	RAY VADEN
H&S OIL CO.	
H.L. BROWN JR. OIL CO.	JEAN MILLS



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MINERAL AND ENERGY INTERESTS

HAMON OIL CO.	
HANAGAN PETROLEUM CORP.	HUGH F. HANAGAN
HANSON ENERGY	WARREN HANSON
HANSON OIL CORP.	
HARPER OIL CO.	CAL GREEN
HARRIS PETROLEUM CONSULTANTS	
HARVARD PETROLEUM CORP.	
HARVEY E. YATES CO.	
HCW EXPLORATION, INC	
HE PRINCE OIL CO.	H.E. PRINCE
HIGHLAND PRODUCTION	
HILLIARD OIL & GAS INC.	
HILLIN PRODUCTION CO.	
HLW EXPLORATION INC.	
HNG OIL CO.	W. R. LEWIS
HOLLY ENERGY	
HOLLY ENERGY INC.	ROBERT H. LOYD
HOMESTAKE MINING CO.	JOHN HARDEWAY
HONDO DRILLING	
HONDO OIL & GAS CO.	
HONEYSUCKLE EXPLORATION CORP.	
HOWELL PETROLEUM CORP.	
HUDSON & HUDSON	RALPH L. GRAY
HUSKY OIL CO.	VERA C. CHANDLER
I & W INC.	
IMCC	
INEXCO OIL CO.	MAX R. AMES
INTERNORTH INC.	
INTNL MINERALS CHEMICAL CORP	WALT THAYER
J. W. HUBER CORP.	
J.D.R. LIMITED OIL CO.	NANCY I. STOIZIE
JACK GRYNBERG & ASSOC.	JACK PLEMONS
JACK PLEMONS OIL CO.	S.J. LADAS
JAKE L. HARMON OIL CO.	JOE B. BELL
JEM RESOURCES INC.	
JIM'S WATER SERVICE	
JOHN H. TRIGG OIL CO.	JOHN H. TRIGG
JUBILEE ENERGY CORP. AND	TEMPO ENERGY CORP.
KAISER & FRANCIS OIL CO.	
KAY JAY OIL CO.	
KEITH COLLINS PETROLEUM CO.	

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MINERAL AND ENERGY INTERESTS

KENAI OIL & GAS INC.	
KENNEDY OIL CO.	
KERN CO.	
KERSEY & DONOHUE	
KIMBALL PRODUCTION CO.	
KIMBELL OIL CO. OF TEXAS	
KINCAID & WATSON DRILLING CO.	NANCY KING
KINCHELOE	
KIRBY EXPLORATION CO.	
KOCH EXPLORATION CO.	H.J. WHISNAND
KOEHANE & SANDERS	
KOEHANE SANDERS ET AL	
LADD PETROLEUM CORP.	J. R. MYERS CLYDE PHILLIPS BERT N. MUNCY JR.
LARUE & MUNCY	
LATCH OPERATIONS	
LAYTON ENTERPRISES INC.	DONALD R. LAYTON
LIBERTY OIL & GAS	
LLAND INC.	
LUCILLE F. MCKINLEY OIL CO	LUCILLE F. MCKINLEY
LUNDBERG INDUSTRIES LTD.	
LYCO ENERGY CORP.	
LYNX PETROLEUM CONSULTANTS INC	
M & G OIL INC.	
M & W OF LOVINGTON, INC.	
MADDOX ENERGY CORP.	BRAD MANTZ RICHARD A. LOWERY NED McMANIFLS RON HEAD
MARALO INC.	
MARATHON OIL CO.	
MARBOB ENERGY CORP.	
MARKS & GARNER PRODUCTION CO.	
MARLINE PETROLEUM CORP.	TED J. BOSTON THOMAS K. WILEY
MARTINDALE PETROLEUM CORP.	
MATADOR PIPELINES INC.	RIGHTS-OF-WAY DEPT. MAX WILSON
MAX WILSON INC.	
MAYNE & HERTZ INC.	
MCCLELLAN OIL CORP.	MARK H. MCCLELLAN
MCKAY OIL CORP.	
MEADCO PROPERTIES LTD.	
MELTON DRILLING & EXPLORATION	
MESA PETROLEUM CO.	REGULATORY DEPT.



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MINERAL AND ENERGY INTERESTS

MEWBOURNE OIL CO.	
MGF OIL CORP.	
MILFORD OIL CO.	
MILLARD DECK OIL CO.	
MINERALS INC.	
MIRANDA ENERGY CORP.	
MISSISSIPPI CHEMICAL CORP.	TILLMAN BRANCH
MITCHELL ENERGY CORP.	MORRIS HOWELL
MKA OIL PROPERTIES	
MOBIL OIL CORP.	
MONSANTO OIL CO.	
MORAN EXPLORATION INC.	
MORANCE	
MOROIL COMPANY INC.	
MOUNTAIN STATES PETROLEUM CO.	
MR OIL CO.	
MSM PRODUCER INC.	
MURCHISON & CLOSUIT	
MURPHEY OPERATING CORP.	
MWJ PRODUCING CO.	
MYERS & ASSOCIATES	
NAPECO INC.	
NATIONAL COOP REFINERY ASSOC.	
NAVAJO PIPELINE CORP.	
NEW MEXICO POTASH CO.	
NEW MEXICO POTASH CORP.	WALTER CASE
NEW TEX OIL CO.	
NEW-MONT OIL CO.	
NM SALT & MINERAL CORP.	
NORANDA EXPLORATION INC.	
NORTEX GAS & OIL CO.	
NORTEX OIL CO.	
NORTH AMERICAN ROYALTIES INC.	
NORWOOD OIL CO.	
NRM PETROLEUM CORP.	
OIL & GAS SERVICES	J. F. McADAMS
OIL AND GAS SERVICES	DEWEY A. SPARGER
OIL REPORTS & GAS SERVICES	DONNA HOLLER
OPERATORS INC.	
ORLA PETCO INC.	
O'NEILL PROPERTIES LTD.	

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MINERAL AND ENERGY INTERESTS

P-M DRILLING CO.	A.G. MCCARVER
PAGE EXPLORATION INC.	H. W. PAGE
PECOS VALLEY OIL INDUSTRIES	
PENNSYLVANIA DRILLING	
PENNZOIL CO.	
PETRO LEWIS	
PETROLEUM CORP. OF DELAWARE	
PETROLEUM DEVELOPMENT CORP.	JAMES C. JOHNSON
PHILLIPS PETROLEUM CO.	P. KENT CRAWFORD
	LENDELL HAWKINS
PIONEER PRODUCTION CORP.	
POGO PRODUCING CO.	JERRY A. COOPER
	GINA GRESHAM
POINT PETROLEUM	
POOL OIL CO.	FRED F. POOL III
POST PETROLEUM CO. INC.	
PREMIER PRODUCTION CO.	
QUANAH PETROLEUM INC.	
R & G WESTALL OIL CO.	RAY WESTALL
R. Q. SILVERTHORNE	NANCY KING
RAULT RESOURCES INC.	
RDC INC.	
READ & STEVENS INC.	JOE M. WIGLEY
RHONDA OPERATING CO.	HOWARD S. DAVIS
ROBINSON RESOURCE DEV. CO.	
ROSE GRAVEL CO.	A.L. ROSE
ROWLAND TRUCKING CO.	
RPM ENERGY INC.	
S & J OPERATING CO.	
SABINE PRODUCTION CO	
SANDERS PETROLEUM CORP.	CHARLES W. SANDERS
SANTA FE ENERGY CO.	
	C. ED HALL
SANTE FE EXPLORATION	
SHELL OIL CO.	
SHELL PIPELINE CORP.	
SHELL WESTERN F & P INC.	
SIETE OIL & GAS	
SOUTHERN UNION CO.	MARTIN ROGGS
SOUTHERN UNION GAS CO.	
SOUTHLAND ROYALTY CO.	



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MINERAL AND ENERGY INTERESTS

SOUTHLAND ROYALTY CO.  
STALLWORTH OIL & GAS INC.  
STANFORD NAT. RESOURCES GROUP  
STEVENS OPERATING CORP.  
SUN EXPLORATION & PROD. CO.  
SUN EXPLORATION & PRODUCTION  
SUNDANCE OIL CO.

SUPERIOR OIL  
SWEATT CONSTRUCTION CO.  
T. B. KNOX ESTATE  
TAHOE OIL AND CATTLE CO.  
TAMARACK PETROLEUM CO., INC.  
TEJAS OIL OPERATOR  
TEMEX ENERGY INC.  
TENNECO OIL CO.  
TERRA RESOURCES INC.  
TEXACO INC.

TEXACO USA  
TEXAS AMERICAN OIL CORP.  
TEXAS CRUDE INC.  
TEXAS INTERNATIONAL CO.  
TEXAS OIL & GAS CORP.  
TEXAS WEST OIL & GAS CORP.  
TEXAS-NEW MEXICO PIPELINE CO.  
TEXON PETROLEUM CORP  
THE EASTLAND OIL CO.  
THE MAURICE C. BROWN CO.  
THE STONE PETROLEUM CO.  
THOMPSON & COVE  
TIPPERARY OIL & GAS CORP.  
TOM BROWN INC.  
TOWNER PETROLEUM CO.  
TRANSWESTERN PIPELINE CO.  
TXO PRODUCTION CORP.  
U.S. BORAX  
UNION OIL OF CALIF.  
UNION TEXAS PETROLEUM CORP.  
UNITED SALT CORP.  
UPLAND PRODUCTION CO.

DENNIS E. SLEDGE  
S & J OPERATING CO.  
JOHN V. WALKER  
JOHN CROWDER  
ROXANNE PARKS  
A.R. HERMANSON  
ARMANDO I. SANDON  
MIDLAND PROD. DIST.

Y. H. MITZ

LAND MANAGER  
ALLEN W. DEES  
STANLEY A. FRIEDLI

MARK H. INGRAM

JIM MORRIS

JAMES SKEILLET  
D. HUNDLEY  
MICHAEL H. RAUSCHKOLB  
LAND MANAGER  
DON F. DOW

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MINERAL AND ENERGY INTERESTS

URIAH EXPLORATION	
VALLEY CONST. INC.	
VF PETROLEUM INC.	
VIKING PETROLEUM INC.	EDWARD V. ROBERTS JR.
VISA EXPLORATION	
W.A. MONCRIEF JR. OIL CO.	W.A. MONCRIEF JR.
W.E. HENDEN JR. OIL CO.	ROBBIE O'DONNELL
WALLEN PRODUCTION CO.	
WALSH & WATTS, INC.	
WARNER INC.	
WEST TEXAS OIL REPORTS	
WESTERN AGRI-MINERALS	
WESTERN DRILLING CO.	
WESTERN OIL PRODUCERS INC.	
WESTERN RESERVES OIL CO.	
WILLIAM G. MCCOY OIL CO.	WILLIAM G. MCCOY
WILLIAMS BRINE	D. WILLIAMS
WOOD & LOCKER INC	
WOODWARD-CLYDE CONSTRUCTION	RUTH ANN KNUDSON
WORLDWIDE ENERGY CO.	
WORTH PETROLEUM CO.	
YATES ENERGY CORP.	
YATES PETROLEUM CORP.	R.G. PATTERSON
YUCCA WATER CO	
ZIA ENERGY	

RECREATION GROUPS

COTTONWOOD GUN CLUB	JESS MCGARY
DESERT ROUGH RIDERS	M. BANISTER
EDDY COUNTY SEARCH AND RESCUE	PERRY DENTON
FREEWHEEL M/C	MIKE L. ATWOOD
MESILLA VALLEY GROTTO	STEVE PEERMAN
NATIONAL SPELEOLOGICAL SOC.	JOLI EATON
	ROBERT R. STITT
PECOS VALLEY GROTTO	CAROL BELSKI
PERMIAN BASIN NSS	BILL BENTLY
SENM SEARCH & RESCUE	ROY BURKHAM
SOUTHWEST REGION NSS	DAVE BELSKI



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UTILITY COMPANIES

ELECTRIC COOP.	CENTRAL VALLEY
GAS COMPANY OF NEW MEXICO	WILLIAM R. DETRICK
LEA COUNTY ELECTRIC COOP	E. R. FELFE
MOUNTAIN BELL REAL ESTATE	
OTERO COUNTY ELECTRIC COOP	
PENASCO VALLEY TELEPHONE COOP	
PLAINS ELECTRIC	DAVID G. USSERY
PUBLIC SERVICE CO. OF NM	ENVIRONMENTAL AFFAIRS MANAGER
SPS CO.	OLON FLUNK
	JAMES R. BRANNEN

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2	USF&WS Ecological Services
3	USDI, Bureau of Mines
4	Mobil Producing Texas & New Mexico, Inc.
5	Southeastern New Mexico Economic Development District
6	Department of the Air Force
7	USDI, Bureau of Reclamation
8	Southeastern New Mexico Grazing Association
9	The University of New Mexico Department of Biology
10	Mississippi Chemical Corporation
11	Hanagan Petroleum Corporation
12	Dale W. Stahlecker
13	Western Ag-Minerals Company
14	Larry Henderson
15	Chevron U.S.A., Inc.
16	National Wildlife Federation
17	Noranda Exploration, Inc.
18	U.S. Environmental Protection Agency
19	Jesse Rayroux
20	U.S. Borax
21	The Nature Conservancy
22	James L. Daly
23	New Mexico Potash Corporation
24	Curtis Doyal
25	Amoco Production Company
26	New Mexico Wildlife Federation
27	Exxon Company, U.S.A.
28	AMAX Chemical Corporation
29	Desert Rough Riders, Inc.
30	Native Plant Society of New Mexico
31	Ann and David Cordero
32	Jim Davidson
33	Office of Cultural Affairs Historic Preservation Division
34	New Mexico Bureau of Mines
35	New Mexico BLM Wilderness Coalition
36	New Mexico Natural History Institute
37	State of New Mexico Office of the Governor
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39	Dave and Carol Belski
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<u>LETTER NO.</u>	<u>COMMENTOR</u>
41	Steve West
42	Ogden Farms and Cattle Company
43	Marathon Oil Company
44	Leonard Minerals Company
45	Sun Exploration and Production Company
46	Chevron U.S.A., Inc.
47	International Minerals and Chemical Corporation
48	Lundberg Industries, Ltd.
49	Yates Petroleum Corporation
50	Joe M. Stell
51	Kincaid Ranch
52	XL Transportation Company
53	New Mexico Cactus-Succulent Society
54	Department of Energy
55	National Wildlife Federation
56	J. C. Freeman
57	National Park Service
58	Eagle Creek Ranch



**WESTERN  
AG-MINERALS  
COMPANY**

File 1614.4  
CRMP (NM067)

P. O. Box 511, Carlsbad, New Mexico 88220 • (505) 885-3175

April 2, 1986

Mr. Charles S. Dahlen  
Area Manager, Carlsbad Resource Area  
Bureau of Land Management  
P.O. Box 1778  
Carlsbad, NM 88220

Dear Mr. Dahlen:

I would like to submit comments pertaining to the Draft Carlsbad Resource Management Plan/Environmental Impact Statement issued in February, 1986. The overall Plan appears to be a major step forward in identifying resource priorities and potential conflicts, and my concern primarily addresses one of those potential conflicts.

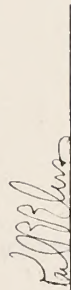
The restrictions placed upon mineral entry proposed for SMA No. 20 (Guadalupe Escarpment Scenic Area) may reduce materially the opportunities for discovery of a sulphur deposit in a geologic environment which is potentially favorable for sulphur occurrence. Sulphur production in the United States is declining due to the lack of new discoveries, but is in continuing high demand as an essential component of fertilizer production. Therefore, we are becoming increasingly dependent on imports.

The best of all alternatives would be to limit the search for sulphur to areas without conflicting emphases. However, an explorationist must concentrate his efforts on areas with high geologic promise. The Permian Basin portion of Southeastern New Mexico and Southwest Texas offers perhaps the best chance of finding additional sulphur deposits in this country.

I am keenly aware of the potential damage to the beauty of the area if no controls were exercised in drilling activities, but I believe that the BLM could work with minerals companies to allow exploration programs that would not conflict with the existing cultural and scenic values.

Thank you for this opportunity for comment on the Plan.

Respectfully yours,

  
Karl E. Elers  
Managing Director

KEE/jps

1-1

The proposed plan will only close the 11,700 acres (zone 1) of the Guadalupe Escarpment Scenic Area and the area furthest from current sulphur prospecting activity. The remainder of the area, while limiting surface disturbance, will still be open for sulphur prospecting. However, in over 30 years of prospecting, no deposits of sulphur large enough to be economically mined have been found and no sulphur leases have ever been issued.

1-1





2

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE

File 1614.4  
CRMP (NM067)

Field Supervisor  
Ecological Services, USFWS  
Post Office Box 4487  
Albuquerque, New Mexico 87196  
April 10, 1986

Cons. #2-22-86-1-072

Memorandum

To: District Manager, Bureau of Land Management, Roswell,  
New Mexico

From: Field Supervisor, FWS, Ecological Services, Albuquerque,  
New Mexico

Subject: Biological Assessment for the Carlsbad Resource Area Management  
Plan/Draft Environmental Impact Statement

We have reviewed the subject assessment and recommend Alternative D1, which eliminates grazing and emphasizes protection of sensitive resources such as wildlife habitats. This alternative would generally enhance fish and wildlife habitat in your resource area. In addition to protection, we recommend improvement of fish and wildlife habitat be included in your management plans.

We agree with your determination of affect on Federally protected species and appreciate your concern for sensitive species. In addition to protecting habitat for sensitive species, we suggest that the Bureau of Land Management (BLM) develop and implement plans to increase and improve habitat for these species. Specific review comments follow.

2-1 [To understand the classification of the 26 sensitive species, Federal and State definitions should be included.]

2-2 [The use of the word "mitigation" should be removed when discussing Federally protected species. Mitigation is not allowed for Federally listed species. The BLM should insure adverse impacts to species are avoided.]

Thank you for the opportunity to comment on your document and we look forward to coordinating with your agency in the future.

John F. Peterson

cc: Area Manager, Bureau of Land Management, Carlsbad, New Mexico  
Regional Director, FWS, Habitat Resources, Albuquerque, New Mexico

2-1

Federal and State definitions of Threatened and Endangered are included in the DEIS Glossary.

2-2

The word "mitigative" has been removed from text and the sentence changed (see FEIS Chapter 3, Additions and Corrections to the Draft).

3

File 1614.4  
CRMP (NM067)

## United States Department of the Interior

## BUREAU OF MINES

P. O. BOX 2506  
BUILDING 20, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

## Intermountain Field Operations Center

April 9, 1986

## Memorandum

To: Charles Dahlen, Area Manager, Carlsbad Resource Area, Bureau of Land Management, 101 E. Mermod, P.O. Box 1778, Carlsbad, NM 88220

From: Chief, Intermountain Field Operations Center

Subject: Review of the Draft Resource Management Plan and Environmental Impact Statement for the Carlsbad Resources Area, Roswell District, New Mexico

Bureau of Mines personnel have reviewed the subject document as requested. The document includes both a proposed resource management plan (RMP) and a draft environmental statement (DES) prepared in accordance with the Bureau of Land Management (BLM) planning regulations, the National Environmental Policy Act (NEPA), and the Federal Land Policy and Management Act (FLPMA). The RMP provides for managing the public lands and allocating resources in the Carlsbad Resource Area with a primary focus on mineral and energy resources, rangeland, access, and critical areas of special management.

Carlsbad Resource Area covers about 5,947,000 acres of land that is owned or controlled by the Forest Service (FS), BLM, Bureau of Reclamation (BOR), State, and private enterprises. A BLM management area of about 2,700,000 acres is included in the RMP.

Known mineral resources within the study area include caliche, dolomite, gravel, gypsum, limestone, natural gas, petroleum, potash, salt, and sulfur. BLM lands within the study area that were previously withdrawn from mineral entry total 48,800 acres (1.8% of BLM land) used by BOR, Department of Energy (DOE), Department of Defense (DOD), State Militia, and the Living Desert State Park.

Additional restrictions could be placed on mineral and energy development in the small management areas (SMAs) (areas of critical environmental concern) where about 274,000 acres (10% of BLM managed land requires special stipulations. Within these 274,000 acres, restrictions on mineral entry include 11,660 acres closed to oil and gas leases; oil and gas production and exploration is restricted on an additional 44,000 acres as a result of No Surface Occupancy stipulations. Also, no leases would be given for potash production on about 44,000 acres. About 66,000 acres would be closed to salable minerals and nearly 25,900 acres closed to locatable minerals.

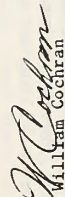
p. 1 of 2



Mineral resources were considered as being one of the primary subjects to be integrated into the management planning process. The RMP and DES adequately state known information about mineral resources and evaluate the environmental impacts of several alternative plans. The preferred alternative is well documented and is acceptable in terms of Bureau of Mines interests and responsibilities.

Certain shortcomings in the maps accompanying the report made interpretation difficult: There are no reference points such as township and range or latitude and longitude marks; the resource outline is different from one map to another; and, an indeterminable scale is incorrectly labeled 1:250,000. Further, revisions of the plan should note the existence of Carlsbad National Park and acres of National Forest within the proposed resource area.

The location of BLM lands now being managed by agencies such as the BOR, BOD, DOE, FS, Parks, etc., also should be shown on the maps. Such lands have areas that are withdrawn from mineral entry, but their position relative to other withdrawals, closures, or restrictions are not shown. For example, it is not clear whether the 44,000 acres with No Surface Occupancy stipulations for oil and gas exploration and production is the same 44,000 acres that is closed to potash production. We believe that subsequent versions of the document should clarify the situation.

  
William Cochran

3-1

The visuals throughout the document were prepared at a scale of 1:250,000 and inadvertently remained labeled as such, and then reduced for publication. Detailed, controlled maps are available in the Resource Area office. The color land status is the only controlled map in the entire document and does show the other Federal lands which border the Resource Area.

3-2

Lands withdrawn from public use for administration by other government agencies are described on page 3-3 and shown on Map A of the Draft. The 44,007 acres proposed for No Surface Occupancy Stipulation is a composite of acreages within many of the proposed Special Management Areas displayed on Table 2-7, page 2-28 and Appendix E of the draft.

3-1

3-2

Mobil Producing Texas & New Mexico Inc.

April 11, 1986

P.O. BOX 633  
MIDLAND TEXAS 79702

United States Department of the Interior  
Bureau of Land Management  
P.O. Box 1778  
Carlsbad, New Mexico 88220

ATTN: Charles Dahlen, Area Manager

RE: RMP/EIS

Dear Mr. Dahlen:

We have reviewed the Draft Carlsbad Resource Management Plan/Environmental Impact Statement (RMP/EIS).

Of the five plans proposed, Mobil Producing Texas and New Mexico, Inc. prefers Plan A. This plan provides for the maximum amount of acreage to be leased and less restrictive drilling and operation policies.

Plan C, which is preferred by the BLM, would create surface occupancy problems and cause our drilling/operation costs to be increased.

We appreciate the opportunity to have reviewed the Draft statement and hope our comments are of some assistance to you.

Very truly yours,

G.E. Tate  
Env. and Reg. Mgr.

AAF/km

A:M610171A-AAF

File 1614.4 CRMP (NM067)  
FROM: Southeastern New Mexico  
Economic Development District  
P.O. Box 5639 - RIAC  
Roswell, New Mexico 88201  
(505) 624-6131

TO: Charles S. Dahlen  
Dept. of the Interior BLM  
101 E. Mermod St.  
P.O. Box 1778  
Carlsbad, NM 88220

RE: SUB-STATE CLEARINGHOUSE REVIEW OF Environmental Impact Statement  
SAI No. NM 86 03 05-031 (Title of Proposal)

This transmittal should serve as our review and comment as required under State Executive Order 12372 for projects requesting federal funding assistance.

1. Does the proposal duplicate any existing or proposed programs or projects which have similar goals and objectives?  
☐ Yes (If yes, identify these programs.)  
☒ No
2. Is the proposed application consistent with a comprehensive plan developed for the area in which it is located?  
☐ Not applicable  
☒ Yes  
☐ No (If no, please explain in what way it is not compatible.)
3. Does the proposal have implications extending beyond the jurisdiction of the local government within which it is located?  
☐ Yes  
☒ No
4. Describe any suggestions or means of improving or strengthening the proposed application.
5. Indicate summary review and comment as follows:  
☐ No comment on this project. However, the information is appreciated.  
☒ Proposal is supported.  
☐ Proposal is supported with recommendations.  
☐ Comments attached.

On the basis of my review, I have indicated my response and/or recommendations above.

Reviewer Steve May Title Env. Dir. Gov.  
Date 2/22/86



Original - APPLICANT  
Copy - S.P.O.  
Copy - S.N.M.E.D.D.



6

1614.4  
CRNP (NN067)934  
RS  
APR 16

DEPARTMENT OF THE AIR FORCE  
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION  
1114 COMMERCE STREET  
DALLAS TEXAS 75242

11 APR 1965  
2930  
9500

11 APR 1965

Mr. Charles W. Luscher  
New Mexico State Office  
U.S. Post Office and Federal Bldg  
South Federal Place  
P.O. Box 1449  
Santa Fe, New Mexico 87501

Dear Mr. Luscher

Thank you for allowing us the opportunity to review the Resource Management Plan/Environmental Impact Statement for the Carlsbad Resource Area New Mexico.

We continue to express our support of the BLM in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently several Air Force air operations including instrument flight training routes traverse a portion of the study area. Specifically, IR 165 traverses the southerly portion of the easterly disposal area and IR 134 traverses the Lincoln National Forest and Carlsbad Caverns National Park. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

Mission requirements, fuel costs and environmental constraints determine the decision to locate military training activities. Because of general aviation and population pressures, low level high speed flights are relegated to areas which are least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how planning and management decisions made by your agency may adversely affect or restrict use of low altitude airspace by the military. The Air Force position on this matter is based on the high training and readiness values rendered by use of this low altitude airspace.

We are aware of your fire suppression activities requiring the use of aircraft, therefore, our flight crews are cautioned to remain alert for your fire suppression activities especially during the normal fire season and they are directed to avoid such activity by at least 5 nautical (5.76 statute) miles.

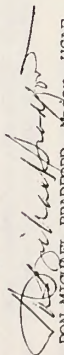
6-1

The land use plan does not propose any actions that would affect low altitude airspace. Future actions such as power lines could impact low altitude corridors and the BLM will advise the Air Force of those types of actions.

6-1

We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntmyer, (214) 653-3341, or FTS 760-1341.

Sincerely

  
DON-MICHAEL BRADFORD, Major, USAF  
Director, Environmental Planning Division

Cy to: HQ USAF/LEEV



7

File 1614.4  
CRMP (NM 067)

## United States Department of the Interior

BUREAU OF RECLAMATION  
SOUTHWEST REGION  
COMMERCE BUILDING, 714 S. TYLER, SUITE 201  
AMARILLO, TEXAS 79101

IN REPLY  
REFER TO: 150

MAY 2 1986

Memorandum

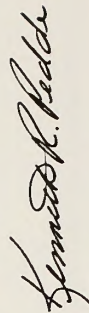
To: Area Manager, Bureau of Land Management, Carlsbad Resource Area,  
Carlsbad, New Mexico

From: ~~ACTING~~ Regional Director

Subject: Review of Draft Resource Management Plan and Environmental Impact  
Statement for Carlsbad Resource Area, Eddy, Lea, and Chaves Counties,  
New Mexico

As requested, the Bureau of Reclamation (Reclamation) has reviewed the subject draft resource management plan and environmental statement. We are in agreement with your proposed Alternative B in that this plan provides additional steps to protect erodible areas and improves watershed conditions. Within the Carlsbad Resource Area, Reclamation is currently constructing Brantley Dam. Our preliminary review of your plan indicates the Brantley Project should not be affected other than possible improvement of watershed conditions over time. This would be a positive benefit to project development.

We appreciate the opportunity to review and comment on the plan.



cc: Commissioner, Attention: 150

Letter No. 6  
p. 2 of 2



8

File 1614.4  
CRMP (NM067)

*Southeastern New Mexico Grazing Association*  
P. O. Box 2914  
Roswell, New Mexico 88202

PRESIDENT  
Bud Eppers  
Box 1139  
Roswell, N.M. 88201  
(505) 623-6103

VICE PRESIDENT  
Mark Kincaid  
701 South Alkinson  
Roswell, N.M. 88201  
(505) 622-0860

SEC'Y & TREAS  
Truman Pierce

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David McRea  
Truman Pierce  
Kenny Smith

May 9, 1986

Mr. Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
101 East Mermod Street  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

The Southeastern New Mexico Grazing Association (SNMGA), having reviewed the Carlsbad Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS), endorses the comments prepared by the New Mexico Department of Agriculture (NMDA) on the RMP/EIS. A copy of those comments (enclosed) and this letter represent the SNMGA's assessment and evaluation of the RMP/EIS.

In addition to the issues raised by NMDA, the SNMGA is concerned that the Bureau of Land Management (BLM) failed to adequately address Section 8 consultation, cooperation, and coordination procedures in the RMP/EIS. Section 8 of the Public Rangelands Improvement Act of 1978 instructs the Secretary of the Interior to consult, cooperate, and coordinate with grazing permittees and other specified parties on the formulation, implementation, and revision of allotment plans. The BLM's New Mexico Rangeland Consultation Policy expands the concept of Section 8 to encompass all BLM grazing permittees and grazing related issues in the consultation, cooperation, and coordination process. Additionally, the policy identifies a specific "target group" available to permittees should they elect to use such a group in the consultation, cooperation, and coordination process.

The RMP/EIS does not include Section 8 provisions and the BLM consultation policy. The SNMGA considers this omission to be a serious deficiency in the RMP/EIS. Accordingly, we recommend inclusion of these provisions and policies in the revised RMP/EIS.

Thank you for the opportunity to review and comment on the Carlsbad RMP/EIS.

Sincerely,

H. W. "Bud" Eppers, President

Enclosure

Livestock permittees and State agencies have been consulted throughout the RMP process consistent with the provisions of Section 8 of the Public Rangelands Improvement Act (P.L. 95-514). The New Mexico BLM consultation and coordination policy and procedures are available for review in the Carlsbad Resource Area office.



The  
**University of New Mexico**

DEPARTMENT OF BIOLOGY  
Albuquerque, NM 87131  
Telephone 505-277-3411

Mr. Charles Dahlen  
Bureau of Land Management  
P.O. Box 1778  
Carlsbad, NM 88220

Dear Mr. Dahlen:

I have briefly examined the draft resource management plan for the Carlsbad Area. I found a major deficiency was the elimination of the Los Medanos Raptor Area from consideration as an Area of Critical Environmental Concern (ACEC). This region has the highest density of breeding raptors ever reported anywhere in the world, making it an area of international significance. In my discussions with scientists, the public, and the press concerning the area, I have found an overwhelming support for the conservation of birds of prey and specifically support for conserving the Los Medanos Raptor Area (see copy of enclosed recent news article). The scientific value of the Harris' Hawk alone is immeasurable, considering its unique social habits, cooperative hunting behavior, and nearly year-round breeding. The conservation of this species in New Mexico is critically important because Harris' Hawk populations are rapidly declining in all parts of its range within the United States. This was my finding in a paper that I was recently asked to prepare for the National Wildlife Federation Conference on Southwestern raptors. As the recognized world expert on the Harris' Hawk, I believe the species to be in serious trouble in the United States and it should be considered a sensitive species or a species of special concern.

I request that the BLM designate the Los Medanos Raptor Area as an ACEC. I would gladly provide a tour of the raptor resource to you or other appropriate person(s) evaluating the area as a potential ACEC. Alternatively, I suggest that you bring in a BLM raptor biologist to independently evaluate the merit of the raptor resources of the Los Medanos Raptor Area. I would suggest Karen Steenhof (of the Snake River Birds of Prey Area), who is internationally respected as a raptor scientist.

In addition, I support the implementation of the appropriate measures needed to minimize disturbance to breeding raptors caused by oil and gas drilling operations. I found that the prescriptions in the management plan to be somewhat confusing and perhaps unclear to the oil and gas industry. I believe that it is very reasonable to 1) request the industry to delay surface disturbance activities within 1/4 mile of an active raptor nest

9-1

9-2

9

File 1614.4  
CRMP (NM067)

12 May 1986

9-1

FLPMA Section 202(c) provides guidelines for special designation areas. The Los Medanos SMA does meet the ACEC requirements because of the unique occurrence of such high density of nesting raptors and has been incorporated into the FEIS in Chapter 2.

9-2

Revisions have been incorporated into the FEIS, Chapter 2.



until the nestlings safely fledge, and 2) to require the proper reclamation of public lands after the minerals have been extracted. The maximum delay periods required would be approximately 85 days (34 d incubation period and 46 d brood-rearing period, plus 5 d buffer period). Since most nests would be discovered sometime in the middle of the nesting attempt, I estimate that the average delay period required would be 30-40 days. Active nests would be most likely encountered between 15 March and 30 July. During other times of the year, few active nests would be found in the proposed drilling and pipeline areas and requests for delays would be rare. After our research is completed on the raptors of the area, I will probably suggest some minor refinements in these guidelines.

Thank you for considering my input.

If I can provide any other information on the Los Medanos Raptor Area, please do not hesitate contact me.

Sincerely,

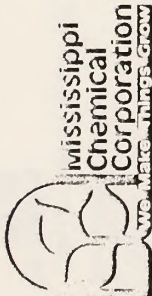
*Jim Bednarz*

Jim Bednarz  
Principal Investigator  
Cooperative Raptor Research  
and Management Program

Encls.

10

File 1614.4  
CRMP (NM067)



May 14, 1986

Bureau of Land Management  
Area Manager  
Carlsbad Resource Area  
PO Box 1778  
Carlsbad, New Mexico 88220

Dear Sirs:

After careful review of your draft, Resource Management Plan, we would like to comment on several aspects of the new plan. First, we do not see the need to change the current plan. We feel the current plan provides adequate protection of all resources within the area. In addition, we feel your new plan leans away from the long-standing policy the BLM has on multiple use of federal lands. It is obvious that the new plan leans heavily towards recreation and away from mining and grazing. If a new plan is developed, it should seek to achieve better balance.

If the plan were to be implemented in its current form, Mississippi Chemical has two areas of critical concern. These two areas of concern relate to the proposed special management areas, Maroon Cliffs and Laguna Plata. Our concerns are as follows:

#### Maroon Cliffs:

Maroon Cliffs special management area lies directly east of our current plant site. The only map showing it's location is your management plan map, Map-D. There is no legal description of the Maroon Cliffs area, but it appears on your map to include our mine, mill, and tailings ponds. This is of great concern to us since the plan calls for no surface occupancy. We feel you should re-examine the area to insure that your special management area doesn't contain land already disturbed by MCC. Further, we feel there should be a buffer around the east side of our plant to allow for future expansion of our tailings pond.

I would like to remind you of the problems Maroon Cliffs have created for MCC and the BLM in the past. As you probably recall, MCC at one time wanted to build a new mine and mill in the Maroon Cliffs area. Due to bureaucratic delays the necessary permits were never obtained. If MCC could have obtained the necessary permits, we would have built a new facility from which to mine and mill our ore body. With this new facility we would have been able to mine at a higher rate and efficiency.

Box 101 - Carlsbad, New Mexico 88220 Phone (505) 887-5591

Page 1 of 2

10-1

The boundaries for the Maroon Cliffs SMA were based on the boundaries established in the East Eddy-Lea Management Framework Plan for Maroon Cliffs. No legal descriptions or maps of the proposed Cultural Resource SMA's were published in the RMP because 36 CFR part 1215.20 prohibits public disclosure of this information except in very restricted circumstances. The Maroon Cliffs SMA boundary has been amended to exclude any areas presently disturbed by MCC's mining operation. A table of lease numbers that may be affected by the proposed cultural SMAs has been developed and is available for review at the Carlsbad Resource Area.

10-1



From this new facility we could have competed with an operation in the Carlsbad area and probably would be running today generating royalties for the BLM.

To aid you in evaluating the Maroon Cliffs area, please find enclosed a map showing our current facilities and approximate area of surface disturbance.

Laguna Plata:

In the Laguna Plata area, little mention is made of Williams Brine Co. which is mining salt under an agreement with National Potash or National's disposing of brine in Laguna Plata. We feel the plan should specifically address these two items. We would like the plan to state that it will allow Williams to continue to mine salt from Laguna Plata and that he has the right to maintain his access. Also, we feel the plan should state National can continue to dispose of brine in Laguna Plata and have surface access to maintain it's pipeline to the lake.

We appreciate this opportunity to comment on this plan. Also, we hope before the plan is finalized, we might be allowed to review it again.

Sincerely,

MISSISSIPPI CHEMICAL CORPORATION

*William Branch*  
Tillman Branch  
General Manager

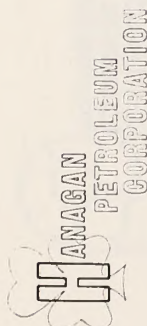
TB/b1

Enclosure

10-2

William's Brine Co. has the right to mine salt and maintain access to the operation under the provisions of the existing lease. Also under the existing lease, National Potash has the right to dispose of the clear brine in Laguna Plata under existing stipulations. Surface access to the pipeline cannot be denied because the pipeline is on State of New Mexico land and because the right to do so is protected by National's existing lease rights.

10-2



File 1614.4  
CRMP (NM067)

PHONE 505 - 623-5053  
400 N. KENTUCKY AVE  
POST OFFICE BOX 1737  
ROSWELL, NEW MEXICO  
88202-1737

May 19, 1986

Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
P.O. Box 1778  
Carlsbad, New Mexico 88220

RE: Proposed RMP/EIS for Carlsbad  
Resource Area - Feb., 1986  
BLM-NM-PT-86-004-4410

Dear Mr. Dahlen:

The proposed Resource Management Plan/Environmental Impact statement (RMP/EIS) once again illustrates the blatant and burdensome overmanagement, by the BLM, of our federal lands.

The BLM has once again devised a bureaucratic nightmare aimed directly at the largest landusers in southeastern New Mexico; the ranching, mining and oil industries. According to the Draft RMP, these three industries directly account for 43% of the total dollar output in the Carlsbad Resource Area (CRA). This figure seems to be extremely low. We are sure that the direct and indirect contribution from these industries account for the vast majority of the economic base of this area. Even though these industries account for most of the jobs in the CRA, not one of these industries was consulted, to our knowledge, in preparing this Draft RMP/EIS. This is reflected in the overwhelming negative opinions voiced by these industries at the public hearing in Carlsbad on May 7, 1986.

The impact of this RMP/EIS on the oil and gas industry would be much greater than indicated in the Draft. Already, many companies will not operate on federal leases in New Mexico because of the punitive stipulations placed upon the industry. Proposals in the Draft would greatly increase, unnecessarily, the amount of acreage with special stipulations by hundreds of thousands of acres, even under the least punitive alternative acreage with special stipulations would increase by almost 200,000 acres. If this RMP is placed in affect there will be a very noticeable reduction in the number of wells drilled on federal acreage and a corresponding loss of production. This will directly reduce monies paid to the U.S. Treasury as well as the state, county and local governments.

The Draft has been intentionally worded to lessen and misrepresent the BLM's true purpose. One example follows;

"This alternative emphasizes production and/or consumption of resources."

This statement refers to alternative B. The Draft implies that alternative B is resource production oriented. This is very misleading. Alternative B proposes a increase in acreage with special stipulations of 153% over present guidelines. This is a increase of almost 200,000 acres from 360,703 acres at present to 552,237 acres in alternative B. Acreage with No Surface Occupancy

11

11-1

11-2

11-3

11-4

11-1

The sectors of the economy portrayed in the EIS were generated using data from the State of New Mexico Employment Statistics. The 43 percent is the direct output of the three referenced industries. The data does not separate out the secondary output in the other sectors. An example would be how much of the dollars spent for food products are generated by the oil and gas sector.

11-2

The minerals/energy and livestock industries were represented at the public meetings held in 1983. They have comprised the majority of mailing lists for the Carlsbad RMP-EIS during issue identification (December, 1983), development of planning criteria (May, 1984), and when mailing response forms to receive copies of the Draft RMP-EIS (December, 1985) were distributed. A review of the mailing list for the draft document shows that these two groups along with associated organizations account for approximately 78 percent of those that received the draft.

11-3

The stipulations proposed in this Resource Management Plan are currently within the authority of the BLM authorized officer under the Mineral Leasing Act of 1920, as amended, and 43 CFR 3100, the onshore oil and gas leasing regulations. The proposed management prescriptions are to comply with mandates and policies to manage various non-mineral resource values and multiple uses of public lands, within the objectives established in the RMP.

In the Draft RMP-EIS, pages 4-15, 4-16, and 4-26, effects of all cumulative management prescriptions on oil and gas leasing were described in terms similar to this letter. However, the only special stipulations determined to result in losses of royalties, lease bonuses, or rental income to the public sector are "no surface occupancy" on large-acreage tracts with shallow wells. The FEIS Appendix E analyzes the impacts of restrictions within each SMA on oil and gas development.

11-4

Paragraph 2 on page 2-26 of the DEIS discusses why Alternative B is more protective than current management. Alternative B was developed to emphasize production while still providing protection for important resource values.



(NSO) stipulations would increase from 4,740 acres to 11,757 acres, a increase of 248%. Acreage with seasonal drilling stipulations would increase 465% from 25,000 acres to 116,160 acres. In regard to drilling in proposed Special Management Areas (SWA) alternative B is identical to the "resource protective" alternative D almost half of the time (47%).

Alternative B is hardly a alternative that will promote exploration in the Carlsbad Resource Area. Current regulations are already considered far to harsh by industry members. Alternative B drastically increases the regulatory burdens placed on a already overburdened industry. The most disturbing aspect is that alternative B is the best alternative the BLM is offering the industry.

Alternative D is labeled "resource protective" in the Draft. This is very true. Under alternative D, tens of thousands of acres would be totally eliminated from possible exploration and hundreds of thousands of acres would have such stringent stipulations that exploration activity would be greatly reduced.

Alternative C is the BLM's "preferred alternative". This alternative is supposedly some sort of compromise between alternatives B and D. Once again this is very misleading. Alternative C is identical to alternative D 74% of the time in regard to exploration in SWA's. Alternative C is always much more similar to alternative D than C. Alternative C would increase the amount of acreage with strict special stipulations 165% from alternative A. Acreage with NSO stipulations would rise to 44,007 acres from 4,740, a increase of 928%. The BLM's intentions are quite clear when one looks at the "preferred alternative".

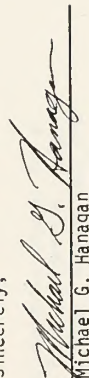
Alternative C and D are totally unacceptable to the oil and gas industry. For that matter, alternative B is such a drastic increase in punitive stipulations that even alternative B is unacceptable to industry..

This is not the time for increased governmental interference. The BLM should be working with members of the oil and gas industry to develop federal acreage to replace declining oil and gas reserves. Cooperation by the BLM would lead to increased jobs and a large increase in monies paid into the federal coffers. Instead, we have the BLM trying to increase punitive regulations with wanton disregard to the effect these actions will have on the oil and gas industry as well as local economies and federal income.

There are several particular aspects of the proposed RMP that are especially bothersome. We, as well as other members of the industry, would be happy to discuss these problems with the BLM, if our input is so desired by the BLM. Thank you for the opportunity to comment on this proposed RMP. We can

only hope that the written and oral comments on this proposal will be heard.

Sincerely,

  
Michael G. Hanagan

cc: The Honorable Pete Dominici  
The Honorable Jeff Bingaman  
The Honorable Manuel Lujan  
The Honorable-Joe Skeen  
The Honorable Bill Richardson  
Francis Cherry, District Manager - Roswell District BLM  
Charles W. Luscher, State Director BLM

11-5

Each alternative was designed to be realistic and possible to implement. Alternative D emphasizes protection but still allows as much production as possible within constraints of the objectives. Consequently, Alternative D did not recommend widespread closures or restrictions. There are, however, major differences between Alternative C and D for many important restrictions and protective stipulations. For example, NSO stipulations increase from 44,007 to 59,527 acres in Alternative D, areas closed to leasable solid minerals increases from 43,976 to 102,576 acres, areas designated for No Livestock Grazing changes from 5,947 to 31,213 acres in Alternative D, OKV limited designations is 323,759 acres as opposed to 79,389 acres in Alternative C, and Rights-of-way avoidance areas increases to 57,598 acres from 39,991 acres in Alternative C. Several of the prescriptions involving large acreage such as protection of caves within the Cave Primary Occurrence zone and protection of raptor and herons within the Los Medanos Raptor Area and the Phantom Banks heronry will only involve minimal site specific impacts.

11-5

515.5 Aztec NW  
Albuquerque, NM  
87107

20 May 1986

Mr. Charles Dahlen, Manager  
Bureau of Land Management  
Carlsbad Resource Area  
P. O. Box 1778  
Carlsbad, NM 88220

Mr. Dahlen:

I have been told that you are considering designating the Los Medanos Raptor Area as an Area of Critical Environmental Concern. Having visited this area to observe raptors, especially the Harris Hawk, I urge you to proceed with the designation. This is a unique resource in New Mexico, and perhaps in the entire continent. I also urge that you implement all recommended restrictions on oil and gas development that have been proposed, which, I might add, appear quite easy for the industry to comply with.

Thank you,

*Dale W. Stahlacker*

Dale W. Stahlacker

12-1

FLPMA Section 202(c) provides guidelines for special designations. The Los Medanos SMA does meet the ACEC requirements because of the unique occurrence of such high density of nesting raptors and has been incorporated into the FEIS, Chapter 2.





**WESTERN  
AG-MINERALS  
COMPANY**

P. O. Box 511, Carlsbad, New Mexico 88220 • (505) 885-3175

May 21, 1986

Mr. Charles S. Dahlen  
Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
P.O. Box 1778  
Carlsbad, NM 88220

Dear Mr. Dahlen:

This letter pertains to the Carlsbad Resource Area Management Plan Environmental Impact Statement (RMP/EIS) February, 1986, and specifically SMA No. 11, Maroon Cliffs National Register Archaeological District.

Western Ag-Minerals Company operates a langbeinite (sulphate of potash magnesia) mine in the Nash Draw area approximately 7 miles south of SMA No. 11. Ore from the mine is currently hauled by railroad to Carlsbad, and thence to a milling and storage facility 22 miles east-northeast of Carlsbad, and approximately one mile north of SMA No. 11. We request that, due to the location of our operations on either side of SMA No. 11, and the possibility that rail haulage of ore could become prohibitively expensive or otherwise unfeasible, we be permitted to obtain a right-of-way for hauling by truck, pipeline, conveyor belt or other means, between our mine and plant. We recognize the archaeological values of the Maroon Cliffs area, and would plan the right-of-way to avoid approaching the cliff area, by locating in the southwest portion of SMA No. 11, and utilizing certain existing non-public roads west of SMA No. 11. We would plan to remain at least one mile from the cliff area.

Our mining operation is one of only two worldwide sources for a specialty type of potash fertilizer used to furnish magnesium, sulphate and a low-chloride source of potash to agriculture. We have been producing and paying royalties from federal lands at this mine for 22 years, and have reserves for an additional 30 years of mining, should

13-1

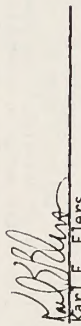
Under the proposed RMP, the entire 14,423-acre Maroon Cliffs Archaeological District would be designated an "Avoidance Area." This action is intended to notify any future applicants for major utility or transportation facilities that the Maroon Cliffs Archaeological District would not be BLM's preferred location for linear routes traversing public lands. Existing potash leases may be granted rights-of-way provided construction and operations meet BLM's objectives to protect and preserve cultural resource values.

Page 2.

economic conditions permit. Having an alternative means of transporting ore to our plant will aid us in maintaining viable operations in the Carlsbad area.

I will be pleased to furnish any additional information you may need in the evaluation of this request. Thank you for your consideration.

Very truly yours,

  
Karl E. Eilers  
Managing Director

KEE/jps

Mr. Charles Dahlen  
Area Manager  
Carlsbad Resource Area  
Bureau of Land Management  
Carlsbad, N.M. 88220

Dear Mr. Dahlen:

I have reviewed the BLM Plan and was impressed with the amount of detail provided. It is obvious that a lot of work has gone into the preparation of the plan and the various alternatives. I generally support Alternative C or D because of the protection and preservation of sensitive habitats and important viewsheds.

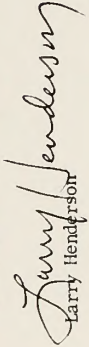
It is very important that you implement the protection recommended for the designated areas of critical environmental concern and that you institute the four research natural areas proposed in the plan.

I strongly encourage your consideration of the importance of the viewsheds from such highly visited points as the roads and backcountry trails in Carlsbad Caverns National Park. Part of the impact of a visit to the park is the magnificent vistas from the escarpment across the lands you manage, and any substantive surface impacts or developments in these vista zones could greatly lessen the awesome experience.

Regarding the Disposals section, I was pleased to see the Sloan inholding in Carlsbad Caverns National Park discussed favorably and sincerely hope that this exchange can take place.

AS specific comments I do support alternative C designating the Dark Canyon SMA an ACEC. On Lonesome Ridge I support alternative C to provide protection for the very grand and rugged scenic and natural values there. For the Guadalupe Escarpment Scenic Area I support alternative C to protect the visual values of the area.

Again I commend you for the work that has gone into preparation of this plan. It has enough detail to permit the reader to make a decision.

  
Larry Henderson

Drawer T  
Carlsbad, N.M. 88220





**Chevron U.S.A. Inc.**  
P.O. Box 1150, Midland, TX 79702

Land Department  
Inner Division

File 1614.4  
CRMP (NM067)

15

May 16, 1986

Re: Draft -- Resource Management  
Plan, EIS -- Carlsbad Resource  
Area

Bureau of Land Management  
Carlsbad Resource Area  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Attention Mr. Charles S. Dahlen

Gentlemen:

Thank you for the opportunity to respond to the EIS study for management of resources in the Carlsbad Resource Area.

The four study alternatives all have points of both positive and negative effect on the oil and gas industry. However, consistently throughout the EIS study area, Alternative "A" more closely parallels the concept of multiple use of public lands and at the same time gives adequate consideration to environmental issues.

Of major concern in Alternative "A" and, in fact, to all of the plans for study is the stipulation for non-surface occupancy. The NSO provision is counter to the multiple use concept and would make exploration for oil and gas at shallow depths cost prohibitive due to the need for directional drilling and inability to conduct seismic programs.

In summary, of the four plans under the EIS, Alternative "A" will continue to provide access to public lands and their multiple use, balance any impact as to environmental concern, and continue to avail public lands for the national goal of energy independence.

Yours very truly,

M. F. COHLMIA  
Land Representative

MFC:rig

15-1

No surface occupancy stipulations on leases would not permanently impair the productivity of the federal mineral estate. Under the proposed plan, 2,675,583 acres would be open for leasing and development without NSO stipulations.

15-1



## NATIONAL WILDLIFE FEDERATION

1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

May 16, 1986

Mr. Charles S. Dahlen  
Area Manager  
Carlsbad Resource Area  
101 E. Mermod St.  
Carlsbad, NM 88220

Dear Mr. Dahlen:

In reviewing the Carlsbad Resource Management Plan/Environmental Impact Statement (RMP/EIS), the National Wildlife Federation has realized the need for additional data regarding mineral resources. According to the RMP/EIS, this information is contained in an earlier document referred to on pg. 3-6 of the chapter on the Affected Environment. Therefore, we would like to request a copy of the Mineral Resource Assessment for the Carlsbad RMP to supplement the discussion presented in the RMP/EIS.

We are pleased to have the opportunity to take part in the Carlsbad land-use planning procedure. We appreciate your cooperation in providing the necessary information to complete our knowledge of the area's resources.

Sincerely,

Kathleen Patnode  
Public Lands &  
Energy Intern



Noranda Exploration, Inc.  
Post Office Drawer 159  
Lithia, Florida 33547

17

File 1614.4  
CRMP (NM067)  
Tel.: (813) 737-1472

**noranda**

May 23, 1986

Charles Dahlen  
Area Manager  
Bureau of Land Management  
Post Office Box 1778  
Carlsbad, New Mexico 88220

REFERENCE: SMA #10 Laguna Plata Archaeological District  
in Appendix E of the Carlsbad Resource Area  
Resource Management Plan EIS Report

Dear Mr. Dahlen:

The Bureau of Land Management in their Carlsbad Resource Area Resource Management Plan EIS report have proposed four alternatives to manage the Laguna Plata Archaeological District.

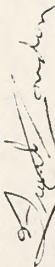
Noranda Exploration, Inc. has potash lease numbers NM 013298-C and NM 26309 in the area affected by the proposed management district. Copies of the stipulations on these leases are attached.

It is Noranda's belief that the stipulations put on these potash leases are sufficient to protect the Laguna Plata Archaeological District.

Of the alternatives proposed by the BLM, Alternative B would be the most favorable selection.

Very truly yours,

NORANDA EXPLORATION



Frank Condon  
Geologist

FC:pn

Attachment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI  
1201 ELM STREET  
DALLAS, TEXAS 75270

MAY 28 1986

Mr. Charles S. Dahlen  
Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
101 E. Mermol Street  
P.O. Box 1778  
Carlsbad, New Mexico 88220

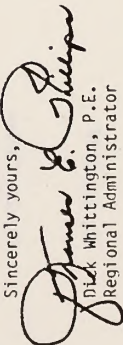
Dear Mr. Dahlen:

We have completed our review of your Draft Environmental Impact Statement (EIS) and Resource Management Plan for the Carlsbad Resource Area, Chaves, Eddy, and Lea Counties, New Mexico. The EIS evaluates the impacts associated with the preferred plan of action which is to balance resource utilization with conservation and to resolve competing or conflicting land uses to promote sustained productivity and multiple use.

We classify your Draft EIS as Lack of Objections (LO). We have no objection to your proposed action as discussed in the Draft EIS. Our classification will be published in the Federal Register according to our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act.

We appreciate the opportunity to review the Draft EIS. Please send our office one (1) copy of the Final EIS at the same time it is sent to the Office of Federal Activities, U.S. Environmental Protection Agency, Washington, D.C.

Sincerely yours,

  
Dick Whittington, P.E.  
Regional Administrator



B L M. Carlsbad N. Mex. 5-28-86

File 1614.4  
CRIP (N067)

My name is Jesse J. Payson, P.O. Box 644, Carlsbad, N. Mex. 88220  
I have a comment # 8076 on the Alternatives map.

There is my response to the Environmental Impact Statement Draft  
2.0-86

First, under the proposed alternative C, under livestock grazing, 5.10  
the initial reduction of 24,859 AUM's. I can not see why the  
reduction should be implemented as it has no merit. Weather  
is the direct factor as to the regulation of livestock numbers.  
It has always been my experience that when permit numbers are  
reduced for some reason they never get reinstated.

I would go along with alternative C, if this reduction in AUM's  
was taken out, also I would like to see the section on page 5.15  
alternative D. Off Road Vehicles, be put in alternative C, because I  
think we need stronger protection against the usage of open range.

In fact I think that off Road Vehicles we should be restricted  
in all but certain designated areas.

Second, alternative D.1 is totally unacceptable to the livestock industry,  
access. I am not sure just what reasonable access is. Hunting vehicle  
access should be confined to the existing graded roads and  
not should to use two track roads or go across country following  
a set of tracks, or geographical or fence lines. There are not  
many areas where there isn't a graded road within 2 or 3 miles  
and I consider this reasonable vehicle access.

oil & gas Drilling locations as pads, pit areas and access roads  
should be kept to a minimum size. They are destroying too much  
of the natural beauty of the land. Drilling pits should always  
be put on the ups hill side of the pads so that leakage will  
not run down canyons or draws, also these pits should  
be allowed to thoroughly dry or the contaminated water hauled off  
to disposal wells or areas, before the pit contractors are allowed  
to level them. By no means should they be breasted to let  
the water out to dry up. The oil companies should be  
held responsible for the contractors they hire.

Jesse J. Payson  
P.O. Box 644  
Carlsbad, N. Mex. 88220

19-1

Appendix Table D6a, which displays carrying capacity estimates by alternative, is a requirement of the planning process and is included for the purpose of analyzing various levels of livestock grazing use. The five-year average of actual use was a point-in-time benchmark against which all alternatives could be analyzed. See page 2-10 of the DEIS under Livestock Use Adjustment for further clarification about future changes in livestock use.

19-2

BLM policy states that off road vehicle use is an acceptable use of public land wherever it is compatible with established resource management objectives [BLM Manual 8340, Off Road Vehicles (General)]. Public input and interdisciplinary review resulted in the proposed designations (open, limited, and closed use designations) of the plan's four alternatives. The proposed designations follow the BLM's policy for ORV use while striving to meet management objectives of other multiple uses of public lands within the CRA.

20

USBORAX

May 28, 1986

Charles S. Dahlen  
Area Manager  
Carlsbad Resource Area-BLM  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Dear Sir:

I have reviewed the Draft RMP/EIS for the Carlsbad Resource Area and have several comments and recommendations to make about the report. The comments will refer both to specific proposed limitations on multiple use and to general comments on the RMP.

Yeso Hills SMA No. 7

I strongly oppose the proposal to designate the Yeso Hills as an area of critical environmental concern (ACEC). The report states that the Yeso Hills possess significant value because of its fragile, nearly pure, "gypsum soils which support a variety of unique gypso-philis." This area is not unique, nor rare, singular, uncommon nor any other adjective synonymous with unique.

20-1

The Castile gypsum outcrops over an area of at least 87,000 acres in Eddy County and over 1 million acres in Culberson County, Texas. The proposed 5,460 acre RNA in the Yeso Hills is almost exactly the same as any other 5,460 acre parcel which overlies the Castile gypsum. The area does not require special management. The area has not merited enough interest even within the BLM to justify an inventory of the supposedly unique plant life. There does not appear to be any reasonable justification for removing this area from multiple use.

Sulphur Exploration

This report is totally inadequate in its treatment of the potential for discovery of a sulphur deposit under the various Alternatives. The Carlsbad Resource Area has been the site of exploration for sulphur for over twenty years and has had no significant detrimental impact upon the environment. Still, virtually the only discussion of sulphur concerns possible negative effects of continued exploration on the ecosystem. Mining is responsible for 13% of the total dollar output in the CRA (Table 3-10). Yet the RMP/EIS does a very shallow job of evaluating the effect of the numerous land withdrawal proposals upon the minerals industry.

20-2

20-1

Because of the size of the Castile gypsum outcrops, the proposed 5,460-acre ACEC has been removed from ACEC status. The Yeso Hills SMA consists in the proposed plan of a 640-acre Research Natural Area (RNA) and has been relocated (see FEIS Chapter 2 and Appendix E map). The RNA status will preserve a representative sample of this fragile ecosystem for study. In addition, 62,840 acres within the Southern Gypsum Soil Area will have limited ORV designation, including restricted geophysical and limited fire suppression to protect the fragile soils (see FEIS Table 2-4). However, this area will be open for sulphur and other mineral exploration.

20-2

The impact analysis of all of the SMA's on the minerals/energy resources has been expanded and is contained in Appendix E of the FEIS.



Considering that mining is the second largest employer in the Carlsbad area, I would have expected the BLM to have more seriously considered the uniqueness of the sulphur potential of the area. The Delaware Basin is the only non-salt dome supplier of sulphur in North America. One of the largest sulphur mines in the world is located in Culberson County, Texas, only 21 miles south of Eddy County, New Mexico. The unique geologic environment which hosts Pennzoil's Culberson Mine extends northward into the CRA. Has anyone in the BLM considered the impact of a new discovery on the economy of Carlsbad? The BLM's royalty on a Culberson-size discovery would be 18 million dollars per year at today's prices. Pennzoil paid \$749,936.14 in 1985 property taxes.

20-2

The Carlsbad area contains some of the most mineralized land in the world, yet this report barely mentions its value to the BLM. The report is unprofessionally vague concerning the impact of various proposed withdrawals on the mining industry. No consideration is given to the fact that all exploration is already subject to over a dozen stipulations and restrictions which adequately protect environmental quality. No changes are needed in current management and stipulations.

#### Drilling Stipulations

It is unnecessary to increase the distance between drilling and known cave occurrences. Current practices are adequate to protect the gypsum caves. Gypsum caves are ephemeral, temporary geologic features. They are continually being filled as surface water washes sand and gravel into the karsts.

The distinction between preservation of limestone caverns vs. gypsum karst should be clearly made in the report.

20-3

#### Off-Road Vehicles

The proposal to increase ORV use is completely unacceptable. There are many parks and wilderness areas where ORV use should be limited, but the Carlsbad Resource Area does not contain any areas which can't be adequately protected by the current management plans.

20-4

#### Recreation

The report states in several areas that activities are enhanced by semi-primitive settings. All of the area should have open access in order to maximize the number of people who can use the area.

20-3

Each cave or karst feature will be evaluated on a case-by-case basis. Stipulations will only be applied as necessary to adequately protect the specific cave resources present.

20-4

Until public lands are designated either open, limited, or closed in the BLM planning system, they are considered open for ORV use (see Glossary, Off Road Vehicle Designations). This RMP proposes to designate 991,711 acres of public land for ORV use which have not been designated in earlier BLM planning documents, and to update previous designations (see Table 2-4). Rather than increase ORV use, this proposed RMP would decrease acreage available for ORV use on public land in order to meet management objectives for resource values which conflict with unconstrained ORV use. Also, see response to comment 19-2.



Visual Resource Management

The VRM classifications should all be abandoned. The BLM has been assigned the duty to allocate public resources for the best use. VRM's are in conflict with other more significant uses of the land. Also, the VRM's totally ignore the presence of adjacent state and private land where VRM's are inoperative. If any area is so visually special, it should be protected through existing legislation, not through a subjective rating procedure which can be arbitrarily applied to prevent development of the area's other resources.

T&E's

The report makes very little distinction between the various degree of protection measures needed for federal endangered, threatened and proposed threatened species. The report also makes various vague references to areas of "suitable habitat" for certain species. Suitable habitat is not a reasonable criteria for removing an area from multiple use. The area also has suitable habitat for bison but I can't see any reason to lock away land for a bison habitat preserve.

Black-Footed Ferret

Appendix D14 lists the rare animal species in the Carlsbad Resource Area. The black-footed ferret is listed even though it is only known to live near Meeteetsee, Wyoming. I'm glad to see that your biologists have a sense of humor, but inaccurate information like this should be deleted from the report.

Laguna Plata

The section on Laguna Plata (E.10) ignores the D. Williams sodium operation on the lake surface, and has no map of the area adjacent to the text. The State has recently permitted a brine disposal plant in the southwest area of the lake perimeter. It is likely that New Mexico Potash will need Laguna Plata as a brine depository after Laguna Toston is used up. Also D. Williams mines salt from the lake surface and pays a royalty on it, through NPC, now MCC.

Poor Maps and Other Problems

The errors start on the inside cover of the EIS and continue to the outside cover where the Carlsbad zip code is "88240" instead of the correct 88220. The Postal Permit Number is actually the printing permit number. Inside the final cover, the 3 maps have the wrong scale 1:250,000, and no range and township grids.

Appendix E reference list has the wrong page numbers. All maps should have township and range grids, and all withdrawals, ACEC, SMA's, NSO's and NRA's should be listed with full legal description.

20-5

The Federal Land Policy and Management Act of 1976 (FLPMA) places scenic resources on an equal basis with other resources, where in Section 201(a) it states that the Secretary of Interior shall... "prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values)..."

Section 102 of the FLPMA further requires that.... "public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; that, where appropriate, will preserve and protect certain lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use..."

When evaluating scenic quality and visual sensitivity, adjacent scenery and land uses are considered in developing VKM objectives for public land.

20-6

Legal distinctions between protective measures for "Endangered," "Threatened," and "Proposed" are described in detail in the Endangered Species Act (Amended 1982). Although these differences exist, it is BLM policy to place species with a Federal status as high priority for management. If the species is listed, then management follows recovery plan guidelines. If the species is proposed, the management is geared toward improving species condition and enhancement of the habitat to avoid listing of the species.

The term "suitable habitat" was one criteria used for SWA designation. However, it could be a very important potential experimental planting area for listed species to supplement and enhance existing populations.

20-7

The black-footed ferret is listed for the State of New Mexico with historical range within the Resource Area, and the BLM is required to address all listed T&E species.

20-8

See response to comment 10-2.

20-9

See response to comment 3-1.

20-10

The page numbers have been corrected and more detailed maps of specific Special Management Areas have been included in the FEIS Appendix E.



None of the so-called cultural sites have legal descriptions. This is because it is "privileged information." The large SMA map has no township or range lines. How can mineral operations protest the NSO stipulations if they are not described? The Maroon Cliff NSO area incorporates the MCC Refinery according to the SMA map. Isn't this being ridiculous?

Mailing List

The Mailing List is extremely biased. Whoever prepared the list appears to have purposely removed proponents of multiple use. None of the sulphur prospecting permittees were included in the mailing. The list lacks many solid mineral companies, including some major potash operations and lease holders.

A new mailing list should be prepared. A second mailing list should be made so that all of the major interest groups can have adequate notice of these proposed changes.

Economics

Under the proposed management changes, the State and Eddy County stand to lose considerable revenue from canceled oil leases. The State would lose royalties and rentals from State land and the potential for discovering sulphur would be reduced.

The New Mexico School System is funded by severance taxes. Looking around the State at the poor health of the uranium, copper, coal, oil and gas and potash industries, I don't see a real bright future for the school system. To further hamper oil, gas, and potash exploration and to try to exclude sulphur exploration does not seem to be very rational.

The BLM should hire an economist to evaluate the alternatives. Clearly, the existing financial analysis is inadequate and flawed.

Sincerely,  
*Michael H. Rauschkolb*  
Michael H. Rauschkolb

MHR:lan

20-11

See response to comment 11-2.

20-12

An expanded analysis of the impacts to the minerals and energy industries is included in the FEIS Appendix E.

20-11

20-12

# 21 The Nature Conservancy

New Mexico Field Office  
Post Office Box 1846 / Albuquerque, New Mexico 87103  
610 Gold S.W. Suite 202  
(505) 242-2015

May 30, 1986

Mr. Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
P. O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

Thank you for providing us with a copy of the Draft Resource Management Plan and Environmental Impact Statement for the Carlsbad Resource Area. Thanks also to you and your staff for taking the time to review this plan with me during my visit in April. We are pleased to have this opportunity to comment.

The Nature Conservancy is a non-profit conservation organization with some 270,000 members, of which 2500 reside in New Mexico. Our resources primarily are devoted to the protection of exemplary natural communities and habitats containing rare or sensitive plant and animal species. To identify these critical habitats we draw upon data from many sources, principally that compiled by the New Mexico Natural Heritage Inventory. This is a State program that employs standardized methods to generate information about New Mexico's natural elements. The Heritage Program was developed in 1976 through the combined efforts of The Nature Conservancy and the New Mexico state government.

Of the various public lands in New Mexico, the Carlsbad Resource Area ranks at the top level in biological diversity. We appreciate that the most significant of these values known to occur in the Resource Area have been recognized by the preparers of this plan and that both Alternatives C (Preferred) and D (Protection) would adopt appropriate measures to insure the long-term protection of these sensitive resources. Through this letter, The Nature Conservancy wishes to register our endorsement of the Plan, particularly of the proposed Special Management Areas that would maintain healthy natural ecological conditions where threatened, endangered or sensitive plants and animal species depend on it for their survival. Some specific comments follow.

## RIPARIAN HABITATS

Current U. S. Department of the Interior guidance emphasizing protection of riparian resources on public lands is particularly appropriate in the Southwest. The Nature Conservancy recently undertook a survey of critical habitats throughout the United States and concluded that riparian areas in the Southwest are among the most threatened in the nation and in need of urgent protection. Accordingly, our uppermost priority in New Mexico is the protection of fragile riparian habitats and associated rare or threatened taxa.

This plan's approach to riparian area management including the proposed decrease in grazing on these fragile areas is commendable. To provide optimal protection for riparian areas, we urge that the final plan adopt the ORV management prescriptions of Alternative D with the rationale expressed on page





Mr. Charles S. Dahlen  
Bureau of Land Management  
Page Two

4-40. As noted here, this action would have only a slight impact on ORV recreational use opportunities, yet increased protection to sensitive habitats would be significant.

#### THREATENED, ENDANGERED AND SENSITIVE SPECIES

The list of rare plant and animal species occurring on the resource area in Appendix D13 and D14 is thorough and indicates solid researching of records by your staff. The New Mexico sensitive plant list now includes five additional species that are found in the area, and we recommend that these be added to the final planning document since all are rare plants. Our records provide the following information:

*Aquilegia chapmanii* (Chaplin's columbine) has been recorded from T26S-R22E, Sec. 19 on the proposed Lonesome Ridge ACEC. *Astragalus waterfallii* (Waterfall milkvetch) has been collected on T17S-R21E on BLM land in the Hope, NM area. *Iberis tripartita* (Bush melon) is known from T22S-R31E on the proposed Los Medanos Raptor Area SMA. *Perilyx quinqueflora* (five-flowered cliff daisy) probably occurs on the proposed Lonesome Ridge ACEC. *Streptanthus carinatus* (fleshy twist flower) has been collected from three locations: T20S-R25E, Sec. 24; T20S-R26E, Sec. 19 (both of these are on the proposed Seven River Hills ACEC) and T22S-R30E, Sec. 15 which is on the originally proposed Livingston Ridge ACEC.

In addition, two more species now being considered for listing by the State are found on the Resource Area. Both are suffering from commercial and private plant collectors and are rapidly losing ground in New Mexico. You already are aware of the population of *Ferocactus wislizenii* (southwestern barrel cactus) which needs monitoring and protection. The other species is *Yucca torreyi* (Torrey yucca) which occurs on Guadalupe Mountains escarpment, no doubt on the proposed Lonesome Ridge ACEC.

On page 2-12 of the document it is stated that State listed T&E species will be protected through cooperative agreements with NM Department of Game & Fish. We suggest you include the NM Natural Resources Survey Section (Natural Resources Department) here to cover T&E plants as well as animals.

#### SPECIAL MANAGEMENT AREAS

The following SMA's proposed in the Preferred Alternative address important plant or animal populations and are of special interest to The Nature Conservancy. We strongly recommend that all of these be included in the final plan. It should be noted that a total of 19,970 acres are recommended for ACEC designation and 4,420 acres for RNA designation. This is just over one percent of the total Resource Area acreage and certainly cannot be considered excessive.

**Seven River Hills.** The management prescription for a 540-acre habitat preserve for Federally Threatened *Eriogonum exsophyllum* called for in Alternative C is adequate; however we believe this area qualifies as an ACEC and recommend that designation. The Recovery Plan objectives should be fully implemented. We are concerned over the effect of the Brantly Dam power line right-of-way here that may impact the gypsum buckwheat population and ask that consultations be held with U. S. Fish & Wildlife before construction proceeds.

21-1

*Aquilegia chapmanii* has been added to Appendix D-13 (see FEIS, Appendices Additions and Corrections to the Draft). The State Endangered Plant List (HB-347) does not list the additional plants of concern. Records and documentation for sensitive plant species are sent to the State Department of Natural Resources as they become available.

21-2

New Mexico Natural Resources Department has been added to Chapter 2 (see FEIS, Chapter 2, Additions and corrections to the Draft).

21-3

The right-of-way lies outside the 540 acre Critical Habitat. Section 7 consultation was conducted with the U.S. Fish and Wildlife Service, and gypsum wild buckwheat plants were fully protected from any disturbance. An ACEC designation will be applied to the 540-acre Critical Habitat to accomplish Recovery Plan guidelines and enhance management of the species and habitat.

**McKittrick Hill Caves Complex.** One of these caves provides a nursery for the Western big-eared bat, *Plecotus townsendii pallascens*. Although this subspecies is not thought to be endangered at this time, three of the four other subspecies of *P. townsendii* are Federally listed or are candidates. We support the Preferred Alternative proposals and suggest that the bat population here be regularly monitored to insure that no adverse human activities are allowed to occur.

**Fence Canyon Caves Complex.** A species of pseudoscorpion new to science, *Aphrastochthonius pachysetus*, has been collected from one of the caves in this complex, adding impetus for including the Fence Canyon Caves in the Cave Resources SMA. We support protection designations for these caves as proposed in Alternatives C and D.

**Chosa Draw Caves Complex.** The plan has identified five State endangered fish, one listed frog, and two listed reptiles inhabiting the spring waters and lands adjacent to this system of 60 gypsum caves. A blind cave-adapted amphipod species of scud, a probable candidate for T&E status, inhabits at least one of these caves. The white-ankled mouse, *Peromyscus pectoralis*, which is rare in New Mexico, occurs on the surrounding gypsum soils, as do several sensitive plant populations. Because of the unusual concentration of sensitive plants and animals needing protection, we recommend Alternative D which provides for a 2360-acre ACEC and would restrict surface disturbance on a sufficiently adequate area containing fragile resources as well as lessening the possibility of contamination of the unique hydrologic ecosystem.

**South Texas Hill Canyon.** The 1360-acre Research Natural Area proposed in the Preferred Alternative may be adequate. However, we recommend that the additional 600-acre buffer zone per Alternative D be included at least until the endangered plant species inventory is completed. At that time the final RNA boundaries should be established based upon natural ecological criteria and fencing economics.

**Dark Canyon.** We support the plan's proposal to establish a 3950-acre ACEC to protect the two State-Endangered plants and other resource values found here.

**Lonesome Ridge.** Habitat protection for Big Canyon is one of The Nature Conservancy's highest priorities for public lands in New Mexico. Thirteen listed plant species including *Aquilegia chaulioides*, *Aster laevis* var. *guadalupeensis*, *Chaetochloa harsneri*, *Corryanthus sneedii* var. *sneedii*, *Hedeoma pinnatifidum*, *Penstemon cardinalis* ssp. *texensis*, *Pteris quinquefolia*, *Polypodium rimulicola* var. *rimulicola*, *Silene grisea*, *Sophora xiphioides* var. *texana* are known to occur in the Big Canyon drainage. Several additional T&E plants are probable here. At least five listed animals have been recorded. Big Canyon, which received the highest priority ranking for National Natural Landmark status in a recent report by Dr. William A. Dick-Peddie (A Survey of Potential Natural Landmarks of the Chihuahuan Desert-Mexican Highlands Region, August 1982), is extraordinarily rich in endemic plant diversity, contains a remarkable avifauna, has nationally significant geologic values including caves and remains in a pristine condition.



Mr. Charles S. Dahlen  
Bureau of Land Management  
Page Four

The Nature Conservancy has recommended to the Forest Service that a Research Natural Area for the upper portion of the Canyon be established within the Lincoln National Forest, and we highly endorse the BLM Preferred Action Alternative plan for designating the lower portion as the 2,990 acre Lonesome Ridge ACEC.

Springs Riparian Habitat. BLM's recognition of the biological importance of these six springs and adjacent habitat is commendable. An inventory of all fish and other aquatic animals is needed. Because of the recognized importance of riparian habitat in the desert, we urge that the Alternative D management prescription be adopted which will provide maximum protection to 1006 acres including the 160-acre ACEC.

Yaso Hills. This gypsum soil area is known to be prime habitat for the Federal candidate and State Endangered Astragalus gypsodes. A needed biological inventory here is likely to record other listed plants and animals. Until the inventory can be made, we recommend Alternative D level protection to the 5,460 acres proposed for an ACEC including the 640-acre RNA. This management prescription will provide adequate protection for the numerous small drainages in the Yaso Hills.

Bluntnose Shiner Habitat. We believe that these two parcels on the Pecos River should remain in public ownership and should be managed as habitat for the endangered fish as called for in the Preferred Alternative of the plan.

Little McKittrick Draw. The 500-acre T&E habitat including a 100-acre RNA for the endangered New Mexico Ramshorn snail as proposed in the Preferred Alternative has our endorsement. It should be noted that this snail is known to survive in only one other location and thus is highly endangered.

Los Medanos Raptor Area. We support the proposal to manage this large area with emphasis on habitat protection for breeding, wintering and migrating raptors.

Pecos River Canyons. The wealth of rare and endangered animals and plants inhabiting these canyons and their waters has been identified in the plan. An up to date plant inventory is needed as is a biological inventory for the hot springs on the proposed RNA. This unit clearly comprises one of the most important places in the Resource Area for the preservation of endemic biological diversity. The Nature Conservancy strongly endorses the 5,190-acre ACEC which will include an RNA of 2,320 acres. Maximum protection is appropriate here.

Livingston Ridge. The document states that an 800-acre parcel was nominated but not qualified for ACEC designation. We would appreciate knowing the basis for this determination. The State Endangered sand dune unicorn plant (Proserpinaca sabulosa) occurs here, although it is recognized that this plant is now known to be more common in the eastern part of the State than originally thought. A cactus species now being considered for State listing because of human impacts also grows here as does Sirentanthus carlinatus (fleshy twist flower), a species on the New Mexico sensitive plant list. We suggest that this area be reevaluated for ACEC designation.

21-4

The Bureau recognizes the need for further inventories in several SMAs. These will be conducted on a priority basis in conjunction with development of activity plans.

21-5

See response to comment 21-4.

21-6

The nomination was reevaluated. The dune unicorn plant is abundant throughout deep sandy soils in New Mexico and West Texas. As additional species become listed on the State HB 347 list, the Livingston Ridge area, as well as any other area, will again be nominated or proposed for protection under a special designation.

Mr. Charles S. Dahlen  
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Page Five


SUMMARY

Throughout the planning document, it has been noted that inventories for threatened or endangered plants and animals that may occur on the several sensitive areas have not been completed. The Nature Conservancy urges you to place high priority on completing these inventories. We also ask that you develop a schedule for monitoring the condition of these sensitive areas, principally the SMA's proposed in the plan, and suggest that the plan should include a statement about the agencies' agenda for inventory and monitoring.

It has been a pleasure to review this plan as we believe it to be an extremely thoughtful and sound document. We look forward to working in cooperation with the Bureau of Land Management to achieve the various strategies for public land protection proposed for the Carlsbad Resource Area.

Again, thank you for the opportunity to present our input. Please retain us on your mailing list.

Sincerely,



William W. Dunmire  
NM Public Lands Coordinator

cc: New Mexico State Director  
Bureau of Land Management  
P. O. Box 1449  
Santa Fe, New Mexico 87504



James L. Daly  
2407 General Bradley N.E.  
Albuquerque, N.M. 87112  
30 May 1986

Mr. Charles Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area Headquarters  
P.O. Box 1778  
Carlsbad, N.M. 88220

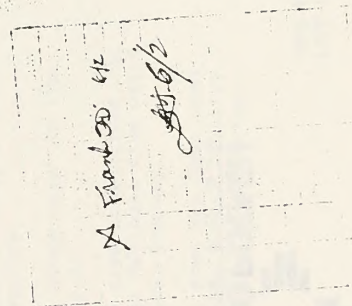
Dear Mr. Dahlen:

I am writing in support of the Los Medanos Raptor Area and its establishment as an Area of Critical Environmental Concern. I just finished attending the Southwest Raptor Management Symposium in Tucson, Arizona where two of the main issues discussed were habitat destruction and the disturbance of nesting areas. There is certainly no doubt about the value of Los Medanos as both a wintering and breeding area to a variety of raptor species as well as other wildlife, and restrictions on activities around nests during the breeding season should be strictly enforced. From what I know about the proposed restrictions on gas and oil activities in the area, it appears that reasonable limitations will be set that both the raptors and the industry can live with.

In closing, I would like to express a very personal interest in the Los Medanos Raptor Area. In the summer of 1983, I spent five days working with Jim Bednarz in Los Medanos, and was so impressed with the area and the birds that I have been involved in raptor field studies since that time. Conservation of this area will not only benefit the raptors, but can also increase the public's knowledge and appreciation of this unique form of wildlife.

Sincerely,

*James L. Daly*  
James L. Daly



22-1

See response to comment 9-1.



File 1614.4  
CRMP (NM067)

June 3, 1986

Mr. Charles Dahlen, Area Manager  
Bureau of Land Management  
Post Office Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

Re: Draft Carlsbad Resource  
Management Plan/Environmental  
Impact Statement (RMP/EIS)

This will confirm in writing the verbal presentation of Mr. Robert H. Lane on May 7, 1986, which stated New Mexico Potash Corporation's position on the subject.

Our specific comments deal with only one section of the RMP; however, we strongly favor the multiple-use concept and generally oppose any plan that withdraws any more land from use by the agricultural and industrial sectors. For these reasons we support the general tenor of comments made by representatives of the mining, oil and ranching industries at the public hearing.

The long-term viability of our operation, as well as that of a future operation about the same size as ours, rests with the availability of that portion of Laguna Plata below the 3,450 foot contour for disposal of clays associated with mined potash ores. We oppose any plan which would exclude Laguna Plata from such use. Considering potential income to the federal government of \$140 million from royalties and the impact of 800 jobs over 50 years versus study of archeological sites which "have been well picked over for many years," certainly suggests a plan mutually favorable to the government and the potash industry. Of the alternatives presented in your plan none would appear to provide that benefit. A modification of Alternative "B" allowing for use below the 3,450 foot contour and a small pipeline right-of-way would be more beneficial.

We comment specifically on Appendix E-10 (Laguna Plata Archeological District): New Mexico Potash Corporation obtained the potash holdings of Kerr-McGee Corporation on April 5, 1985, and has operated the Hobbs Potash Facility since that date. At the present time, we are operating at sixty per cent (60%) of rated capacity and employ 237 people. The need of Laguna Plata for a disposal site for clay tailings has been known to the Bureau of Land Management since 1977 when Kerr-McGee's long-range mining plan was submitted and approved; and, again, by letter in May of 1977 to the BLM, in which Kerr-McGee indicated that Laguna Plata was proposed as a future depository.

23-1

Establishment of the proposed Laguna Plata Archaeological District is consistent with the principles of Multiple Use Management as defined in the Federal Land Policy Management Act (FLPMA) of 1976 (see 43 USC 1701, Sec. 102, a. 8). The cultural resource values present at Laguna Plata have been reviewed and affirmed by the State Historic Preservation Officer and by the Advisory Council for Historic Preservation as required by law (36 CFR 800). The Bureau of Land Management, in turn, is required to manage cultural resources with due regard to their sensitivity while permitting compatible uses, when feasible. Land use planning decisions are not designed to address specific land use proposals such as the use of Laguna Plata for clay tailings disposal below the 3450-foot contour. Such a proposal, when received by this office, will be analysed and full consideration will be given to all the alternative uses and resource values at that time.

23-1



June 3, 1986

On August 5, 1983, Kerr-McGee met with various BLM personnel at their office in Carlsbad to present a proposal and discuss the procedures and policies involving an application for tailings disposal in Laguna Plata, as the present disposal site in Laguna Toston had a short useful life. Accordingly, by letter dated August 9, 1983, the Area Manager gave Kerr-McGee a brief list of information needed to assess the proposal and authorization to conduct a centerline survey of a 30 foot right-of-way and a perimeter survey of the 3,450 foot contour at Laguna Plata. A plat of the completed survey was presented to the BLM on October 7, 1983.

On October 18, 1983, Kerr-McGee met with eight BLM personnel, chosen to evaluate the proposal, to further discuss the procedures and information involving a proposed application. At that time, an on-the-ground inspection of the proposed Laguna Plata right-of-way and site was performed.

On November 9, 1983, Kerr-McGee received a letter from the BLM requesting extensive detailed information which they deemed necessary to study the engineering feasibility aspects of the proposal. Shortly after that Kerr-McGee made the decision to sell their potash holdings in New Mexico, and no formal application was filed.

New Mexico Potash assumed operation of the Hobbs Potash Facility on April 5, 1985, and in May of that year filed an application to amend right-of-way No. 12177 (Laguna Toston) by adding 110 acres to provide maximum utilization of the natural impoundment area and increase the useful life by six to eight years. This application was approved on July 25, 1985.

New Mexico Potash Corporation proposes that the Bureau of Land Management set aside the area below the 3,450 contour of Laguna Plata for the disposal of clay tailings of the potash industry and disposal of produced salt water of the oil industry for the following reasons:

- 1) Due to the low angle of repose of the clay tailings produced from the high clay content of the ore in this area, manmade impoundment areas are not economically justified due to cost and surface area required.
- 2) Four natural impoundment areas exist in the general area (see Exhibit 1):
  - a) Williams Sink: This area is required for the future use of the National Mine owned by Mississippi Chemical Company.
  - b) Laguna Toston: This area has been used since 1970 by the Hobbs Potash Facility and has limited useful life remaining.

Again, we must emphasize the need for a portion of Laguna Plata to be left open for clay tailings disposal. The continued operation of New Mexico Potash Corporation and the development of potash resources in the east and northeast portion of the potash enclave is directly dependent on the use of Laguna Plata for clay tailing impoundment.

Sincerely,

NEW MEXICO POTASH CORPORATION

*Walter S. Case, Jr.*  
Walter S. Case, Jr.  
Facility Manager

WSC/lj

Enclosure

copies to: Randal Tomblin, Vertac Chemical Corporation, Memphis, Tenn.  
Senator Jeff Bingaman, Washington, D. C.  
Senator Pete Domenici, Washington, D. C.  
Representative Joe Skeen, Washington, D. C.

June 3, 1986

- 3 -

RMP/EIS

c) Laguna Tonto: If used for clay tailings it could hold 4,000 acre feet to the 3,545 contour or the output of clay tailings of one mine producing 3,000,000 tons of ore per year for approximately eleven (11) years.

d) Laguna Plata: Could contain 35,000 acre feet of clay tailings below the 3,450 contour which would provide a disposal area for the more than 300,000,000 tons of measured and indicated potash reserves contained in the leasehold area of New Mexico Potash Corporation and the leased and unleased lands of Townships 19 & 20 South, Ranges 32, 33 and 34 East.

3) The future mining of the existing mine and development of a new mine (or mines) in the area will depend on the state and federal governments to provide the only disposal site available (Laguna Plata) for the clay tailing produced.

#### FACTS AND FIGURES

Assume two (2) 3,000,000 Ton-Per-Year mines were operating in the area:

- 1) 300,000,000 tons of recoverable measured and indicated reserves at 14.5% K<sub>2</sub>O and 6.5% clay;
- 2) Life of each property would be fifty (50) years;
- 3) Each mine would employ 400 people (800 total employees);
- 4) \$20,000,000 annual payroll;
- 5) Reserve contains 58,000,000 tons of product;
- 6) \$4,000,000,000 product value at \$70/Ton;
- 7) \$140,000,000 royalty due to federal and state government;
- 8) Annual disposal requirement for each plant for clay tailings is 350 acre feet;
- 9) Impact on culture resource values would be minimal. The area has been mapped of its known cultural sites and as stated in your letter of November 9, 1983, "The sites have been well picked over for many years."; also, the majority of the culture sites are above the 3,450 contour section and the few below would not be impacted for years after the start of the impoundment of clay tailings;
- 10) Impact on grazing would be minimal.



Page 1

24

Jun 3, 1986

Mr. Charles L. Dahley, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
101 E. Main Street  
P.O. Box 1778  
Carlsbad, N.M. 88220

File 1614.4  
CRMP (NM067)

Dear Sir:

Listed below are some comments I wish to make concerning the Carlsbad Resource Area Resource Management Plan and Environmental Impact Statement.

Land disposal - 2-3 - if this land is classified as agricultural land, it should be appraised by using the "capitalization" approach where the income produced sets the fair market price. This system is used in other government agency appraisals. This would insure fair market value. I feel all isolated tracts of less than 2 sections should be disposed of; preferably through present users.

All improvements should be calculated in capitalization approach if paid for by the government. The buyer of these tracts should not be required to pay twice for them. Land withdrawals - 2-5 - I do not see how any land can be withdrawn from multiple use; this is not consistent with current policies.

24-1

5-71

24-1

No mention is made in the Chapter 2 disposal section concerning land being classified for agriculture. Refer to DEIS page 3-2, Retention, for further clarifications on Agricultural classification.

24-2

As stated on DEIS page 2-5, it is BLM policy to minimize withdrawals. The BLM is reviewing existing withdrawals to revoke or modify those not absolutely necessary. Withdrawals essential for public safety or protection of special uses and resources are authorized under FLPMA Sec. 204.

24-2

- Slide - 2-8 - I feel this is one of the biggest mismanagement efforts the government has. I have not ever seen where B&M has even tried to stop soil erosion ever. There are several hundred cubic acres lost each year through your neglect. You also neglect to state that seed must be put on disturbed soil. This is needed to get cover on this soil. If as much attention was given to this topic as is to some special interest projects I feel we could save at least some of our soils. This whole topic needs to be redone and put into use.

- Water - 2-8 - This is another area I feel did not get proper attention. The main concern of B&M is to obtain ownership of water. I feel this is a socialistic approach. With proper management of the land I feel this would bring back more springs and increase the flow of quality water in the rivers. If the B&M would review some work done in Texas they would find how proper management of land will in turn increase stream flow. Look at private work - not just B&M projects.

- Chemical Veg. treatment - 2-9 - This is a lazy way of controlling unwanted plants. It is also too expensive for private citizens to do since the government has gotten into it. Proper grazing should apply on all management tools.



Page 3

- Livestock Grazing - 2-9 - This should be part of the multiple use of these lands instead of looking for ways to remove the rancher from the BLM lands. The agency should be looking at ways to improve the land where all interests would benefit - more livestock grazing, more wildlife, more water, more fishing as a result of that water increase, less soil erosion, less undesirable brush & weeds and more oil & gas exploration where everyone can benefit.

- Range land improvements - 2-10 - Some design and Engineering requirements are abundant and the whole set of specifications should be redone and some one other than BLM employees should have a say in how they are set up.

- Wildlife - 2-11 - "No fences should be modified at any ones request." There is more to wildlife management than to provide a place for it to walk and a bush if it wants to eat.

Let's face it, BLM cannot do wildlife management when the N.M. Game & Fish dept. controls the harvest of Game & Fish. You may kid somebody but not everybody!

- Fire management 2-12 - This is the most cost effective tool the BLM has to improve the land and I do not see where it is being used to its fullest benefit. There should be no full suppression! This is one area where present man, including BLM, can not improve over the methods of our forefathers before European man came

Put along with his preservationist ways. Before "Smoking the Bear" came along and preached that fire was bad for his forest our environment was doing quite well. Fire control and lack of properly controlled fires has caused all BLM lands to become overgrown with undesirable species of plants which serve no good to anyone or anything. I feel this should be a large part of this EIS as it has an effect on Soils, Water, wildlife, livestock grazing and recreation. With proper use of this item it can make the total use of all this land more productive to everyone. It will not damage the caves in the area either. BLM should get down to serious business on this item and make this land productive - NOT put it into a preservationist state where it is worthless!

It is BLM policy to implement visual design considerations into all surface disturbing projects regardless of size or potential impact. Emphasis is placed on providing these inputs during the initial planning and design phase to minimize costly redesign and mitigation at later phases of project design and development (BLM Manual 8400.06, Visual Resource Management). This table depicts a type of project design which would assist in implementing this policy.

- Table 2-1 - This table should be completely removed from the EIS as it serves as no benefit to anyone except special interest groups. This is not supposed to be done as this is public land.
- Visual Resources 2-16 - This is one of the most ridiculous items in the report. Man wants to live here but he does not want to see where he has lived. This is another special interest groups way to remove man from BLM lands.
- Right of way 2-17 - Corridors - This is



Page 5  
NOT in the best interest of our country!  
This would allow some other country to  
wiper-out our utilities with a single bomb.  
This idea should be removed from the EIS  
completely!

-Access - 2-17 - I can not see the reason be-  
hind this as on one hand BLM is proposing  
"wilderness" areas to cut off all access then  
on the other hand they are trying to opening  
roads all over the balance. Why not remove  
this also and let it alone until the people  
of the country become so weak they can  
not walk - then we could build a road  
every mile or so to facilitate hunting  
only from a car and exercises only in  
the local gym

-Table 2-3 shows 25 new access and 12  
more new access - This plan seems to  
cut numerous new roads that would  
add to the soil erosion problem, benefit  
only a few special interest groups and  
tear up more land. I feel we have enough  
roads on the public lands.  
-Table 2-9 - I do not feel that any minerals  
should be totally closed off. There can be  
restrictions placed on them where all can  
benefit. I do not want to be forced  
to depend on Khomeni or Khadafi for  
my energy!

24-5

Refer to "wilderness" (page 2-19) of the draft RMP/EIS document. It is not  
within the scope of this planning document to assess wilderness as an issue.  
This RMP would form the basis for managing these areas if they are not  
designated wilderness.

24-6

Road construction is only one of the available methods listed on DEIS page  
2-17 which could be used to provide access to public lands. Any new roads  
would be constructed in accordance with engineering standards designed to  
minimize erosion. Legal access to public lands would be available for use by  
the general public.

Page 6

-Page 2-30 - I am against the Dept. of Game and Fish getting control of any more land until they demonstrate that they are going to use proper management. Also I do not see how you can justify removing 1329 acres from livestock grazing to protect riparian habitat. You have not shown any just cause in this document for such an order.

-Table 2-14- Page 2-38 - Should be removed. You have not shown any justification. This is simply another BLM employees special interest project and should not be allowed without justification.

-Page 3-3 - I am opposed to any transfer of even 1 acre of land to the NPS under any condition as they have enough land now that actually should be put back under the control of the BLM where it could be used by more people instead of hoarded by a few.

-Recreation & Public Purpose R+RP-3-3 This should be expanded on by further uses such as - a tract could be lease to the local Sportsman Club to have their club house and outdoor activities at which would better relations among all users.

24-7

24-7

Protection of all wetlands and riparian areas are required through Executive Orders 11988 and 11990, floodplains and wetland protection acts.

24-8

24-8

See response to comment 20-5.

5-76

24-9

24-9

Chapter 3 (page 3-3) only reflects the current situation. Additional R&PPs can be authorized on a case-by-case basis as described on page 2-5 of the Draft EIS, Recreation and Public Purposes.



24-10

Page 7  
-Erosion & sedimentation 3-9 - I do not feel this was taken from on site visual inspection of this area. I will challenge BLM to fully support these figures. They were probably taken from a map sitting in an air-conditioned office instead of the field where they should have been.

-Ground water quality 3-11 - No where do I find where BLM is actively trying to protect our ground water from salt water of gas production. I guess this is because much of our water is already unacceptable for human consumption.

24-11

-Big Game 3-16 - I question your figures quoted by NM, Gt F Dept. - If you are going to allow them to do this on wildlifes without let the oil & gas people do theirs and the Ranchers do theirs. This is a little unfair to say the least. I feel this needs the BLM's fullest attention to understand what is happening with our wildlifes. It is my opinion BLM should get their own facts on this and take a more active role in wildlifes habitat throughout the U.S.. The trend from BLM is to remove the hunters after they have removed the Ranchers & oil & gas people.

How or where did BLM get the information that the Mountain Lion is increasing in the area? The NPS Report just out states it is stable. Some one is wrong - who?

-ACEC-3-19 - I feel this classification

24-13

24-10

Erosion class and watershed condition statistics were summarized from phase I watershed field transect data. Sediment yield rates are estimates developed by the U.S. Soil Conservation Service. The data may be inspected at the Carlsbad Area and Roswell District offices.

24-11

The New Mexico Oil Conservation Division (NMOCD) has the primary responsibility for protecting groundwater supplies due to oil and gas activities, and the BLM regulates the disposal of produced water from oil and gas development on public land. BLM and NMOCD regulates the cementing requirements for all oil and gas wells to protect groundwater supplies (see DEIS page 2-6, Continuing Management, Oil and Gas).

24-12

The Bureau's wildlife commitment outlined by law is to manage habitat. The Bureau and the New Mexico Department of Game and Fish will continue to gather the best possible information on big game populations.

24-13

The population status of the mountain lion has been deleted from DEIS, page 3-16 (see FEIS Chapter 3).

24-12

Page 8  
should be removed. There are present regulations to cover protection of these areas already. This elfeel is just a setup toward "wilderness" them to the N.P.S. This should not be classified as such, you have not supported your decision in the docket and until it is fully supported this should be removed.

#4 Dark Canyon - You contradict yourself in different parts of the paragraph - so what is the real reason to put this area in?

- Visual Resources - 3-29 - The Park can take care of its problem areas on its own. The BLM lands are not part of the Park at present so should not be of any concern to the people using the park. This is another example of a BLM employee using his outside interests to inject an opinions through his govt. job. This exploitation should not be allowed. These areas and also ACEC's - if the Park is so concerned they could restrict visitor travel to areas where views are "disrupted" as they have with the case of vehicular travel in the park as NO horses in "the bowl". Let them use their own rules + regulations instead of interfering their idles into BLM.

24-14

The Dark Canyon SMA was developed because of scenic and visual values, intensively managed caves, and state listed endangered plant species.

24-14



Page 9-

-Wilderness -3-33 - All wilderness should be removed as it does not meet requirements unless "loop holes" are created to facilitate their passage. There are no legally qualified wilderness areas here since man has worked these lands for over a century.

-Quality of life social setting- 3-35 - This is old, outdated information you are using to try to drive each user of the public lands against each other - this type of power play should not be employed by the BLM as they are supposed to be stewards of the land for everyone and should not be trying to cause friction. I take it personally - your accusations made here are directed towards me. Just because most BLM employees feel this way does not mean this is a general trend!

-Ranching industry -3-36 - This needs to be redone by someone who knows Ranch analysis. I do not have the time nor the space to bring to your attention all that needs further study.

-Environmental Consequences - with the assumptions made it is hard to see how they will work forward. This type operation works best to know your goals and work back to the start. This is what is what you did on this book. Why was there not a

plan put in to make maximum productivity of all resources from this land? If "B" was to do this I feel you need a completely new staff. There are places where I feel you have taken the bottom end of production and represented it as the "top" end.

24-15

DEIS page 2-26, paragraphs 1 and 2 outlines the objectives for Alternative B and explains why Alternative B recommends more environmental protection than under current management.

Enclosed is a typical budget for a ranch operation which could be used as a guide line on typical operations. This is the exact budget used on this operation but not from Carlsbad BLM area just outside.

This operator has put to use all new present range management techniques as it is set up with a "lowery" operation etc. This will give you a more realistic approach as this is an actual plan worked - there is no other cost as included in BLM's budgets.

- Table 5-1 - There are 6 M.S. in this list of people - out of 13 - this is approximately 50%. There are 101 yr. of BLM or govt. experience and by way of university experiences here. These people have only worked for BLM, NPS + FS USGS - this has contributed to not having another look at the EIS... This contributes to in house policy making decisions that are passed down through different channels of our Bureau. With present attitude of our BLM it is not hard to see why the EIS is non-productivity from the out side world - w/t gas, wildlife, ranching etc.

I feel some of these people have used this EIS to promote their own interests through their govt. job. These special interest employees should be working for all the people of the US, not just their private interests.

- Appraisal - B-1 - I feel you should develop a set or guideline to properly appraise property. Why does the BLM not use the capitalization approach to selling agricultural land.



24-18

24-18

The BLM is charged with cooperative management of the public rangelands to promote rangeland productivity on a sustained yield basis. Grazing privileges allow for the grazing use of the public rangelands so long as good stewardship ensures their productivity through proper resource management.

24-19

24-19

Actual use records have been rechecked and verified, and the figures listed for allotment number 8116 in DEIS Table D-6a on page D-11 are correct.

Page 11  
Appendix D-4-D-5 - The BLM should provide management of land only. The Rancher is charged with his operation to run it as he sees fit as long as he stays in BLM's regulations. BLM should not ever get involved with Ranch management as it has already messed up the land to where it is only partly productive.

Page D-11 #8116 - when I was just getting started on this unit I was in the process of getting fully stocked. This Ranch since 1981, has been fully stocked (by BLM actual records). Actual AUM's should be listed as 3024 unless you are looking for a "loop hole" to justify cutting allotments.

This unit can be improved greatly for grazing and Wildlife with BLM's cooperation. In the past there has been only (1) one word used from BLM — NO! I feel this is a deterrent to

both BLM and myself as far as improving this unit to make it produce what it is capable of. I do not find that any plan in this EIS will provide any incentive for improvement until the BLM changes its attitude.

Sincerely,

*Curtis Deyal*

Curtis Deyal

1609 Park Canyon Rd.

Carlsbad, NM 88220

cc/file



**Amoco Production Company**

Denver Region  
1170 E. Kentucky  
P.O. Box 800  
Denver, Colorado 80201  
303-830-4040

Roberta Andersen  
Public Lands Coordinator

May 22, 1986

Mr. Charles S. Dahlen, Area Manager  
Carlsbad Resource Area  
Bureau of Land Management  
P. O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

Amoco Production Company is a subsidiary of Amoco Corporation. Our employees are charged with the responsibility for finding and producing oil and gas throughout the United States. Amoco Production Company has a well-established position and a great interest in the Carlsbad Resource Area. We appreciate the opportunity to comment on the draft Resource Management Plan.

BLM has been managing oil and gas exploration, production, and transportation in the Carlsbad RA for more than five decades. The importance of energy and minerals to the area, the state, and the nation are well documented in the RMP. We appreciate the fact that four people with geology degrees were included on the JD team.

This RMP presents an excellent testimonial to the fact that multiple-use management and professional judgment have worked well in the past, and can continue to work well in the future. The land ownerships, climate, and economics in the CRA have offered a variety of challenges to federal, state, and private managers which seem to be resulting in success. For this and other reasons, we support Alternative A, Continuation of Present Management.

It is well documented in the RMP that all necessary management authority presently exists. It is also well documented that Cooperative Management Agreements with private landowners, local governments, development interests, and sportsmen's clubs are resulting in situations which are considered "environmentally desirable." Examples are Executive Order 11988, which protects flood plains, access construction and maintenance performed by resource users, which increases recreation access, and maintenance of water developments by the Carlsbad Sportsman Club for the benefit of wildlife.

Ranching, minerals and energy, and hunting are so economically valuable to the RA that they must be considered the "highest and best" uses of the area. We note that even with a high concentration of these uses, various forms of recreation have continued to increase over the years; mule deer populations are optimum and stable (3-16); Pronghorn antelope numbers are increasing and habitat is stable (3-16); Barbary sheep, mountain lion, and javelina numbers



Mr. Charles S. Dahlen

-2-

May 22, 1986

are increasing; (3-16); and the RA has the "highest reported [raptor] breeding and nesting densities in the United States," according to recent University of New Mexico research (3-19).

Current cave protection and management is obviously adequate (3-27 and 3-29) and users achieve a high quality of use throughout the area. We believe this quality experience will be maintained because of BLM's current management emphasis. Increased buffers are unnecessary.

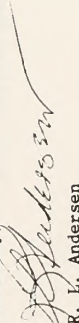
It is alarming to note how many forms of land withdrawal from the normal range of multiple-use activities are proposed in the other 3 alternatives. These include areas of critical environmental concern, scenic areas, national natural landmarks, research natural areas, outstanding natural areas, special recreation management areas, visual resource management class I air quality areas, cultural resource management areas, and right-of-way avoidance areas. It is clear that BLM professionals understand the land and resources in their care. Granting of special labels won't enhance management; indeed, it will likely increase conflicts. By not giving these areas arbitrary boundaries and set-in-concrete designations, BLM can keep its options open and maintain maximum flexibility to deal with changes that will occur. Such changes include improvements in technology and development methodology, as well as cooperative resource improvement among the various user groups in this resource area.

Please note on page 4-4, the assumption that "The price of oil and natural gas will not experience any major changes in price" is faulty. This false assumption naturally affects the last assumption on that page, "Taxation rates and policies concerning oil and natural gas will not undergo any major change." The changes which have occurred in the energy industry just the past few months demonstrate the level of flexibility required of federal land managers to meet changing conditions. "Locking in" management prescriptions which may prove to be inappropriate is bad policy.

Two-thirds of the federal land base is off limits to this industry because of statutory and administrative withdrawals, Congressional moratoria, appeals and lawsuits, special studies, and prescriptions established in Plans. Where energy resources are known to exist, it is folly to apply arbitrary withdrawal mechanisms in the name of environmental protection. Responsible energy companies have displayed a high commitment to protection of the environment, including prompt reclamation when necessary. Domestic energy security is dependent on the common sense of land managers. Multiple-use works; it should be nourished wherever possible.

Thank you again for this opportunity to comment.

Sincerely,

  
R. L. Andersen

RLA:sd

cc: Mr. L. R. Smith  
Amoco Production Company  
P. O. Box 68  
Hobbs, New Mexico 88240

25-1

The size of the cave management units is proposed for two reasons: (1) to ensure the protection of these unique and highly significant caves and (2) to maintain as much as possible the natural setting of the area which is also an integral part of the recreation experience. The caves themselves are, effectively, a nonrenewable resource which are highly susceptible to inadvertent damage from surface disturbing activities. Further, because other recreation activities such as camping, exploration for new caves, hiking, and sightseeing are an important part of the overall caving experience, it is necessary to conduct oil and gas exploration and development in an unobtrusive manner, hence, the need for an increased area of protection.

25-2

The areas designated in the RMP were analyzed using criteria contained in FLPMA and do have values which conflict with current production uses. The plan will be evaluated periodically and as technology advances, the current restrictions may be relaxed.

25-3

The assumption concerning the price of oil and gas was made to provide a basis for analysis. While the BLM is aware that special stipulations do impact the mineral and energy industries locally (see expanded analysis in FLEIS Chapter 4), the assumption was made recognizing that world market and political policies exercise the major influence on market prices and, therefore, on local drilling activities.

25-3



Affiliated with National Wildlife Federation

## NEW MEXICO WILDLIFE FEDERATION

300 VAL VERDE, S.E.  
ALBUQUERQUE, NEW MEXICO 87108  
TELEPHONE (505) 265-7372  
5-7-86

## Draft Carlisbad Resource Management Plan/Environmental Impact Statement

My name is Tom Thornton, past president and director, New Mexico Wildlife Federation, representing over 3,000 members.

We recommend Alternative D. Not because it solves all problems, but because it seems to do the most for the most people. None of the alternative, in our opinion, adequately address all problems concerning the land.

We commend the BLM for its proposal to actually build a recreation site at Red Bluff on the Pecos River, although 160 acres is a pitifully small recreation area, especially in light of the fact there is not one BLM recreation facility in the entire 2.2 million acres serving over 104,000 people of the area. Under Recreation and Public Purpose you list 4 sanitary land fills, 1 shooting range, 1 motocross, and one correctional facility. The range and motocross are, of course privately built and operated.

Why is it that you can recommend up to a million dollars a year on grazing improvements and not one cent on recreation facilities. Not that we oppose the money spent on grazing, as the land needs it and we commend you for it.

In Table 3-10 you list dollar output by various industries in the CRMP but you never list recreation, hunting, fishing, hiking, camping, boating, photography, etc. Hunting and fishing alone bring a tremendous number of dollars to this area and could bring even more if we would restore the Pecos River to what it was 30-40 years ago, and we could do it.

Under Land Tenure you propose over 220,000 acres for disposal, various ways. We oppose disposal of public lands except in rare cases of convenience and good of the public lands.

Under Minerals - we recommend you abandon entirely salt water disposal in earthen tanks or pits. Use metal tanks or inject with no damage to water supplies.

Solid minerals - we repeat something we have been asking you to do for many years - locate caliche pits out of sight and when abandoned, grade them to catch runoff water for wildlife and cattle.

Vegetation - we are not convinced that spraying and other treatment of vegetation such as shin oak is beneficial to wildlife, or the public, or for that matter, to livestock. We also feel cost far exceeds any benefit.

26-1

Rangeland improvement funds are generated through the collection of grazing fees on public lands. A percentage of these fees are returned to the District where they were collected to be used to fund rangeland improvement projects. Funding for recreation comes from appropriated funds and not through the collection of fees.

26-2

To simplify the input-output model, the items that you have listed were included in the sector "services" on DEIS Table 3-10. The dollars generated by these activities are included in the total dollars for services.

26-3

Published research data documenting the benefits of vegetative manipulation for both livestock and wildlife are in CRA files. Specifications for fencing or vegetative manipulations differ for each proposed project. The concerns for wildlife values are analyzed through Environmental Assessments and interagency reviews prior to project approval.





## Draft Carlsbad Resource Management Plan/Environmental Impact Statement

26-3

Wildlife Habitat - We like most of your proposals in this section out would like details of fence modifications and vegetation treatment you are proposing. Riparian habitat in this area is in tremendous need of help and this would, of course, be a giant step in restoring the Pecos River, and thus wildlife habitat.

26-4

Public Access - Additional access to 4 tracts seems an incredibly small amount out of a total of 130 land tracts. We believe you should spend much more time and money in providing public access to public lands and insuring they remain such.

We appreciate this opportunity to present the Federations views, those of the conservationist and sportsman. We urge you to remember that all these lands belong to the public. The public wants and deserves access. The public wants multiple use and they want a voice in all details of management of this vast and wonderful natural resource.

cc: Senator Pete Domenici  
 Senator Jeff Bingaman  
 Rep Manuel Lujan  
 Rep Joe Skeen

5-85

26-4

The proposed action calls for providing public access in 25 tracts out of the total of 126 tracts in the Carlsbad Resource Area. No action was proposed in most areas because there is adequate access or because small and fragmented parcels of public land are involved.

*Tom Thornton*  
 Tom Thornton  
 Director

**EXXON COMPANY, USA.**

POST OFFICE BOX 1600 • MIDLAND, TEXAS 79702-1600

PRODUCTION DEPARTMENT  
SOUTHWEST ROCKY MOUNTAIN DIVISION  
THOMAS J. THIBOUTS  
REGULATORY AFFAIRS MANAGER

June 4, 1986

Mr. Charles Dahlen, Area Manager  
Carlsbad Resource Area  
P. O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

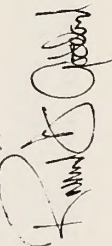
We have reviewed the Draft Environmental Impact Statement for the Carlsbad Resource Area Resource Management Plan and appreciate the opportunity to comment on the alternative proposals for the area. The preferred alternative, C, does not, in our opinion, satisfy the objective of balanced resource use because of proposed no surface occupancy restrictions on eleven Special Management Areas that would make over 42,000 acres with good to excellent oil and gas potential practically impossible to develop. Proposed seasonal drilling restrictions in the Los Medanos Raptor Area and the Phantom Banks Heronries will significantly impede development of an additional 116,160 acres with excellent oil and gas potential. We strongly believe that during the anticipated twenty-year life of the Carlsbad Resource Management Plan, the oil and gas reserves that would be undeveloped or underdeveloped under Alternative C will be sorely needed by the people of the United States for economic prosperity and national security.

Attachment I provides more detail regarding our concerns about the restrictions for fourteen Special Management Areas proposed under Alternative C and expresses our preferred alternative for each. The Special Management Areas are listed roughly in order of decreasing concern.

Exxon currently has mineral leases in five of the Special Management Areas considered in the Resource Management Plan. We do not believe that application of new restrictions to existing leases is reasonable or legal and believe that a clear statement to that effect should be included in the final Environmental Impact Statement.

If you would like to discuss these comments, please contact James Howell at (915) 686-4104.

Yours truly,



TJT:hsf

Attachment

A DIVISION OF EXXON CORPORATION

27-1

Under Alternative C, a total of 44,007 acres (1.6 percent of the total federal acres) of Federal minerals would be designated NSO. Because of the relative sizes, configurations, and locations of the tracts involved, the area not reachable for oil and gas development, particularly with directional drilling techniques, would be significantly less than that (see Chapter 4, Minerals/Energy). The Los Medanos Raptor Area and Phantom Banks Heronries SMAs would involve only seasonal or site specific restrictions and have been further clarified in Chapter 2 of the Final EIS. Approved stipulations will be applied at the time of new lease issuance or lease renewals and will not be imposed on existing leases without consent from the lessee. See FEIS Appendix E for more detailed assessment of impacts on oil and gas development for each SMA.



27-2

Seasonal restrictions within this SMA should limit new oil and gas drilling starts during a maximum 85-day period. Prescriptions for this SMA have been clarified in the FEIS Chapter 2.

27-3

See response to comment 27-2.

27-4

The scenic area was divided into two management zones so that undue restrictions on multiple uses within the entire SMA would not occur. With the entire Resource Area designated from moderate to high in oil and gas potential, Zone 1 is considered moderate, with no development. This virtually unaltered natural landscape has a high visual sensitivity from several observation points, including along U.S. Highway 180, other existing roads within the area, and from locations along the Guadalupe Escarpment on BLM, USFS, and NPS administered lands.

27-5

The expanded analysis in the FEIS Appendix E shows the impact to the minerals/energy resources. However, the significant resource values present in the 4,100-acre area require protective NSO stipulations within the canyons and floodplains to preserve these values.

Under the preferred alternative in the Draft RMP, only oil and gas resources could be extracted from the majority of subsurface federal mineral estate within the SMA. Application of directional drilling techniques from atop the mesa between the two canyons and from adjacent public lands surrounding the SMA would be possible.

27-6

The area of known highest potential for oil and gas extraction within the SMA is within Zone 2, where oil and gas exploration activities could occur. Application of directional drilling methods could allow for exploration and development of any discovered oil and gas reserves of the federal mineral estate within Zone 1.

27-7 and 27-8

The importance of the cultural resource values contained within the Maroon Cliffs and Laguna Plata SMAs have been established through the National Register review process. No surface occupancy is the most effective protection for the sensitive resource values while allowing for energy resource development. The oil and gas resources may be developed, in part, by directional drilling or other extractive techniques.

27-9

The NSO stipulation is necessary to preserve a representative portion of this fragile ecosystem in essentially pristine condition for scientific research. See FEIS Chapter 2 for changes to the Yeso Hills SMA.

27-10

Under the preferred alternative, the acreage identified for NSO is that amount needed to resolve current multiple use conflicts. Also, refer to responses to comments 25-1, 25-2, and 27-6.

#### Attachment I

##### Carlsbad Resource Area SMA's of Particular Concern to Exxon

**27-2** [SMA 13. Los Medanos Raptor Area. Subjecting this large (89,360 acres) and highly prospective area to potential restrictions on drilling and seismic activities for a nine-month season is undesirable. Preferred Alternative: A.]

**27-3** [SMA 15. Phantom Banks Heronries. This 26,800 acre area is highly prospective of oil and gas and should not be subjected to potential restrictions of drilling and seismic activity. Preferred Alternative: A.]

**27-4** [SMA 20. Guadalupe Escarpment Scenic Area. Restrictive stipulations should be minimized in this large area which has excellent proven oil and gas potential. The 11,700 acres designated for no surface occupancy under Alternative G is particularly onerous. Preferred Alternatives: A or B.]

**27-5** [SMA 18. Pecos River/Canyons Complex. Subjecting 4,100 acres of this highly prospective oil and gas area to no surface occupancy stipulations practically precludes its development and is highly undesirable. Preferred Alternative: A.]

**27-6** [SMA 4. Dark Canyon. This area has excellent potential for oil and gas and should not have 4,020 acres removed from development by no surface occupancy restrictions. Preferred Alternatives: A or B.]

**27-7** [SMA 10. Laguna Plata Archaeological District. This 3,360 acre area has very good oil and gas potential and should not be removed from development. Preferred Alternative: B.]

**27-8** [SMA 11. Maroon Cliffs National Register Archaeological District. Because of its high potential for oil and gas development of 1,880 acres of this area should not be precluded by no surface occupancy stipulations. Preferred Alternative: B.]

**27-9** [SMA 7. Yeso Hills. One section of this area should not be removed from potential oil and gas development by no surface occupancy stipulations. Preferred Alternatives: A or B.]

**27-10** [SMA's 2a, 3, 5, 14, and 23. These areas all have moderate potential for oil and gas. Under Alternative C, a total of 16,430 acres in the six areas would be subjected to no surface occupancy stipulations. This acreage should be held to the bare minimum consistent with adequate protection of other resources.]



**AMAX** CHEMICAL CORPORATION  
A Subsidiary of AMAX INC.  
P. O. BOX 279 CARLSBAD, NEW MEXICO 88220 (505) 445-3157

File 1614.4  
CRMP (NM067)

June 4, 1986

Mr. Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
P. O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

Following are comments pertaining to the Resource Management Plan/Environmental Impact Statement for the Carlsbad Resource Area.

- 1) A general comment concerning the five alternatives submitted in this Plan is that I am opposed to all five; however, Alternative A would be the best alternative, from my point of view. I honestly feel that multiple use is, by far, the best use of public land and to restrict public land to a specific use would be in error and should be avoided if at all possible. I believe the restrictive nature of Alternatives B through D are totally unnecessary in Southeastern New Mexico and should be reconsidered so that activities of a multiple nature can be utilized on all public lands in this section of the state. I realize that there are certain restraints and restrictions on the Bureau in doing certain things to protect certain values on the public lands but I believe those values have been greatly overstated in several areas and I propose to address some of those in my following comments.

- 2) The Maroon Cliffs area, which has been nominated as being eligible for the National Register as an archaeological district, in my view, is an over-reaction to some widely distributed and insignificant open campsites, which are numerous throughout Southeastern New Mexico. All other perceived archaeological values are undiscovered and have no foundation whatsoever. I was personally involved with the BLM in 1975 when this nomination and recognition was established and I believe the interest in the archaeological values of this area came from an overactive imagination rather than real, hard facts.

- 3) I believe the Laguna Plata area is also very similar to the comments made above and to restrict that vast area from use as a salt recovery area or as a waste slime disposal area for one of the potash producers would eliminate a resource that would be valuable to Southeastern New Mexico both economically and beneficially to a very depressed potash market and industry.

28-1 and 28-2

The eligibility and significance of properties nominated to the National Register of Historic Places is established through a review process required by law [36 CFR 800; National Historic Preservation Act (NHPPA) of 1966 - as amended]. This process includes review of the nomination by the State Historic Preservation Officer and the Advisory Council for Historic Preservation, which includes the Secretary of the Interior as a member. Until a final decision is made to include or exclude these properties from the National Register, the BLM is required to manage these properties so that their cultural resource values are not impaired by other land use activities.



- 4) The southern part of Eddy County that has been selected for vast areas of withdrawal, approximately 70,000 acres to protect the Yeso Hills, Guadalupe Escarpment, Chosa Caves and Bogle Flat Spring areas, in my belief, is an exaggeration of what is valuable in that area. I do not believe there is good justification for eliminating those areas from the potential of sulphur exploration and other resources just for the scenic values or the protection of wild buckwheat, which obviously have no economic value to the citizens of this county or even for the state.

28-3

I recommend the Carlsbad Resource Management Plan and Environmental Impact Statement be reviewed with a serious thought to the cost/benefit ratio. Heavy emphasis should be placed on supporting the industries, potential and existing, in this area to improve the economic situation, which is greatly depressed, and to keep the land multiple use as much as possible. It appears that there are some in the Bureau that feel it their obligation to close public lands or to prevent resource exploitation, particularly if it has economic benefit to the public at large. From my point of view, I think it is totally unjustified and should be avoided. I highly recommend that the BLM take the alternative which would maximize the multiple use of public lands, including resource exploration.

28-4

Thank you very much for the opportunity to express my views on this Plan and for the consideration I know the Bureau will give my comments.

Very truly yours,

  
J. R. Wallis  
General Manager

JRW:ca

28-3

Under the preferred alternative, an area including the Yeso Hills RWA (640 acres) and the Chosa Draw Caves Complex of the Cave Resources SMA would be the only locations closed to sulfur exploration. Prospecting permits are not currently held for the area covering Yeso Hills RNA. Prospecting permits are currently held for 960 acres of the Chosa Draw Caves Complex. The area closed to sulfur prospecting thus represents about 2-1/2 percent of the approximate 37,800 acres currently held for sulfur prospecting in the CRA. Also see response to comment 20-1.

28-4

Federal funds are expended subsequent to a cost/benefit analysis. The impacts to the mineral and energy industries have been expanded in the FEIS, Appendix E. The BLM is charged with managing a diverse spectrum of resources, the use of which in most cases can coexist on the same acre of land but in some cases they cannot. Just as a recreation site cannot coexist with an oil pad, surface mineral extraction cannot coexist within endangered plant species habitat.

29

DEAR MR. DANLEN,

I WISH TO SUBMIT THIS WRITTEN STATEMENT ALONG WITH MY ORAL STATEMENT GIVEN MAY 7 AT THE MEETING IN CARLSBAD FOR THE RESOURCE MANAGEMENT PLAN. I AM REPRESENTING THE DESERT ROUGH RIDER MOTORCYCLE CLUB IN HOBBS.

AS I STATED AT THE HEARING, WE ARE RECOMMENDING ALTERNATIVE A. FOR THE HACKBERRY LAKE ORV AREA.

WE WOULD LIKE TO SEE PLAN C IMPLEMENTED, EXCEPT FOR THE FACT THAT VERY INTENSE USE IN THE AREA AS A PUBLICIZED ORV AREA COULD POSSIBLY CAUSE US PROBLEMS AS THE MAIN FORCE BEHIND THIS TYPE OF USE FOR THE LAND. WE ARE CONCERNED ABOUT LAND DAMAGE CAUSED BY LARGE 4 WHEEL DRIVE VEHICLES THAT WOULD NOT BE ABLE TO STAY ON THE TRAILS. WE DO NOT WANT TO HAVE PROBLEMS WITH THE BLM NOR THE RANCHERS IN THE PROPOSED ORV AREA, AND EVENTUALLY HAVING THE AREA CLOSED. WE DON'T HAVE ANYTHING AGAINST FOUR WHEEL DRIVES & ETC, AND KNOW THAT OUR INTERESTS ARE BASICALLY THE SAME AND THAT WE SHOULD WORK TOGETHER TO KEEP THE AREAS THAT ARE OPEN.

IF PLAN C IS SELECTED WE WOULD LIKE THE AREA TO BE SET UP MAINLY FOR ATV, MOTORCYCLE USE. NOT CLOSED TO FOUR WHEEL DRIVES AND DUNE BUGGIES, ETC, BUT STRESSED AS ATV & MOTORCYCLE USE. THIS MAY SOUND SELFISH BUT WE WANT TO BE ABLE TO CONTROL EROSION AND TRAIL CONDITIONS, PUBLIC RELATIONS WITH THE RANCHERS AND BLM BECAUSE THESE ARE ~~NEARBY~~ THINGS TO BE CONCERNED ABOUT AS WE SEE LAND BEING CLOSED AND TURNED

29-1

29-1

The BLM acknowledges your concern that SMA delineation could attract more damaging 4-wheel drive use to the Hackberry Lake area and jeopardize future competitive motorcycle events. This SMA was established to ensure continued use for competitive motorcycle events. Other ORV use in the area would be allowed. However, if unanticipated major impacts did result from accelerated use by 4-wheel drive vehicles, emergency ORV closures or limitations (to designated routes) on those specific ORV uses could be imposed.



BACK TO WILDERNESS AREAS ACROSS THE STATES.  
 WE HAVE BEEN VERY PLEASED WITH THE  
 RESPONSE AND COOPERATION FROM THE BLM  
 IN OUR EFFORTS TO HOLD THE HACKBERRY ENDURO.  
 WE HOPE TO CONTINUE WORKING TOGETHER AS  
 IN THE PAST, HOPEFULLY WITH A LITTLE MORE  
 ORGANIZATION ON OUR PART.

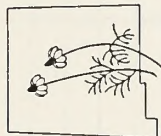
THANK YOU FOR THE OPPORTUNITY TO GIVE  
 OUR VIEWS.

Yours Truly,  
 Tim W. Cochran  
 PRESIDENT -  
 DESERT RANCH RIDERS, INC.  
 1300 W. MARR  
 HOBBS, NEW MEXICO 88340

30

# Native Plant Society of New Mexico

217 Arno S.E.  
 Albuquerque, NM 87102  
 June 3, 1986



Charles S. Dahlen, Area Manager  
 Bureau of Land Management  
 Carlsbad Resource Area  
 101 E. Mermod St.  
 P.O. Box 1778  
 Carlsbad, NM 88220

Dear Mr. Dahlen:

I am writing on behalf of the Native Plant Society of New Mexico in support of Alternative D in reference to the Draft Resource Management Plan for the Carlsbad Resource Area. This Resource Area contains 19 State or Federal listed plant species. As this is our main concern, we would like to see the greatest protection possible. While we would also support Alternative C as a second choice, we find Alternatives A and B insufficient as far as protection of our native plant heritage is concerned. We support the creation of the very important Special Management Areas that have been proposed.

We would appreciate being placed on your mailing list for future issues of environmental concern.

Sincerely,

*Theodore B. Hodoba*

Theodore B. Hodoba,  
 Conservation Chairman

PO BOX 881111 SAN ANTONIO TX 78288-1111

Drawer T  
Carlsbad, New Mexico 88221  
June 3, 1986

31

Mr. Charles Dahlen  
Area Manager  
Carlsbad Resource Area  
Bureau of Land Management  
101 E. Mermod  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

We would like to commend the Bureau of Land Management for its consideration of important biological and cave areas in its Carlsbad Resource Area Draft Resource Management Plan and for its endorsement of Alternative C which provides protection for such sensitive areas.

While Alternative C offers excellent protection to most of the Special Management Areas, such as Seven River Hills, South Texas Hill Canyon, Dark Canyon, Lonesome Ridge, Yesso Hills, Bluntnose Shiner Habitat, Little McKittrick Canyon, Los Medanos Raptor Area, and Pecos River Canyons, the increased protection afforded by Alternative D would seem appropriate for such fragile areas as Chosa Draw Caves Complex and the Springs Riparian Habitat south of White's City. Measures to preserve the biological diversity in southeast New Mexico, including restriction of surface disturbance in fragile gypsum areas, are goals which we heartily support and which we believe should be included in the land management plan for this area. As naturalists and members of the Nature Conservancy, Sierra Club, and several other conservation organizations, we urge you to adopt either Alternative D or Alternative C.

We also want to congratulate the Bureau of Land Management on the excellent work that it does in managing the cave resources in this area and hope that such conscientious cave management will continue.

Thank you.

Sincerely,

*Ann Cordero*  
*David Cordero*  
Ann and David Cordero

32

June 4, 1986  
Queen Rt  
Carlsbad, N.M.

Mr. Charles Dahlen, Area Manager  
Carlsbad Resource Area

Subject: Carlsbad RMA/EIS  
Comment,

I have reviewed the alternative plans from A to D1 and find plan A the most acceptable. Plan A seems to make adequate provisions for the needs of those using public lands. It is well balanced and considers the concerns of all the users.

Under the pressure of use, conditions and compromises have been made as this plan sort of evolved through the years. I feel it to be the most perfect plan possible.

I believe any significant deviation from plan A will generate a great many problems for all concerned.

Sincerely,

*Jim Dawson*





TONY ANAYA  
GOVERNOR

33

STATE OF NEW MEXICO  
OFFICE OF CULTURAL AFFAIRS  
HISTORIC PRESERVATION DIVISION

VILLA RIVERA, ROOM 101  
228 EAST PALACE AVENUE  
SANTA FE, NEW MEXICO 87503  
(505) 827-8320

THOMAS W. MERLAN  
DIRECTOR

CLARA APODACA  
CULTURAL AFFAIRS OFFICER

May 15, 1986

Charles S. Dahlen  
Area Manager  
Carlsbad Resource Area Office  
P.O. Box 1778  
Carlsbad, New Mexico 88220

RE: Carlsbad Resource Management Plan and Environmental Impact  
Statement

Dear Mr. Dahlen:

Thank you for the opportunity to comment on the above plan and environmental impact statement. These comments are provided in accordance with this office's review responsibilities pursuant to Section 106 of the National Historic Preservation Act and 36 CFR 800.

Page 2-16 describes general cultural resource management practices. The major focus of the proposed Plan is on completion of cultural resource review and compliance responsibilities under Section 106 of the NHPA. The Carlsbad BLM currently has an active Section 106 compliance program and in our opinion, makes considerable efforts to control development-related impacts to archaeological sites. Over the past several years, your office has also been very cooperative in providing current archaeological site and survey information for timely inclusion in the State's Archaeological Records Management System. We appreciate this cooperation and encourage your office to review its archaeological records to insure that all previous site and survey records have been entered into the system. We also encourage the Bureau to require that archaeological contractors complete records checks prior to inventory to help minimize the possibility of survey duplication.

While the Plan is generally oriented toward fulfilling review and compliance responsibilities under Section 106, Alternatives C, D and DI of the Plan also outline some affirmative measures to protect a small number of significant cultural resources in the area, including the Laguna Plata Archaeological District, the Maroon Cliffs, Potash Bull Wheel, Poco Site, Bear Grass Draw, Pierce Canyon, Honest Injun Cave, Pecos River Canyons Complex and Pope's Well. As noted in the Plan, cultural resource management plans will be completed for some of these areas. We support the Bureau's efforts to protect these areas, and also to acquire non-federal lands in these areas in order to further the protection of cultural resources.

Alternatives A and B provide for significantly less cultural resource protection. Alternatives C, D, and E appear to provide for significantly more archaeological resource protection, and are preferred alternatives from a cultural resource standpoint.

However, in any of the alternatives, a number of fundamental problems were noted. In our opinion, the following items should be modified in the final Plan/EIS if it is to be consistent with the Bureau's legal responsibilities for cultural resource protection under both Sections 106 and 110 of the National Historic Preservation Act:

1. The existing cultural resources overview included in the Plan is oriented toward the general reader and does not provide enough information to evaluate the proposed management of cultural resources. The final plan should include a more extensive analysis of existing cultural resource information, in order to determine how cultural resources may be affected by implementation of the proposed alternatives. This analysis could be done as a separate technical document, since it may contain archaeological site information protected by law. Whatever its form, it should be done as part of final revision for the Plan/EIS.

2. This management-oriented analysis should include a geographic evaluation of inventory coverage across the resource area, identifying types and distribution of archaeological sites and areas of differential archaeological sensitivity. It should also identify areas where existing information is insufficient and where additional inventories are needed. It should also include an analysis of impacts to cultural resources, outlining steps to reduce such damage. Since recreation is an important use of the area, the cultural resource analysis should also identify sites which may be suitable for public interpretation.

3. The cultural resource analysis should be prepared in accordance with the planning standards outlined in the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation. We would appreciate an opportunity to review this analysis.

4. The document seems to make a fundamental assumption that adequate cultural resource data exist for making the types of decisions and resource allocations that are outlined in this long range plan. However, only three percent of the resource area has been surveyed to date, mostly small surveys of five acres or less. Without additional analysis, such small-scale surveys do not provide adequate information regarding prehistoric settlement patterns. We strongly encourage the Bureau to complete its data synthesis project. We also support the Bureau's efforts to update the regional overview for the resource area. Both are important projects and should be completed as soon as possible if the Bureau is to manage its archaeological resources in an effective manner.

5. The Plan needs to make provision for systematic completion of Section 110 inventories, particularly block inventory. This is particularly important in the Carlsbad area, since virtually no large scale surveys have been conducted to date. We recommend that the Plan establish annual acreage goals for completion of non-project-related inventories and that the final plan or

33-1

The discussion of cultural resources presented in the RMP was written in nontechnical language to effectively communicate cultural resource information to the general reader. While the information presented in the document is more general than would be found in a technical publication, it is based on reviews of the literature for southeastern New Mexico and cultural data located in BLM files. Because 36 CFR part 1215.20 prohibits public disclosure of the nature and location of cultural resources except under restricted circumstances, it is inappropriate to provide detailed information in a public document.

33-2

The BLM is currently in the process of producing an analysis which incorporates these variables through the Data Synthesis Project.

33-3

All Bureau standards and guidelines will be complied with and the SHPO will be provided the opportunity to review and comment.

33-4

When the Class I inventory and Data Synthesis projects are complete, the critical inventory needs will be identified.

33-5

See the response to comment 33-4 above. Establishment of nonproject related acreage goals would be meaningless in the absence of program funding. Given the current monetary constraints on all Bureau programs, funding for nonproject inventory is unlikely. The Bureau is aware of the section 110 responsibilities and of critical inventory needs.

33-1

33-2

33-3

33-4

33-5



33-5

supporting documentation include a list of priority areas. We suggest that the western portion of the resource area, such as the east slope of the Guadalupe Mountains, be considered as a priority area, since this area is generally lacking in survey data.

Conducting such surveys on an ongoing basis will assist the BLM in planning since it will identify archaeological and historic resources which may merit more protection. The Bureau cannot adequately manage its cultural resources if it does not know what they are or where they are located. Completion of comprehensive inventories is also required by Section 110 of the National Historic Preservation Act.

In addition, the Plan needs to make provision for completion of National Register nominations, as required by Section 110. In recent years, the Carlsbad BLM has completed no National Register nominations, in spite of the fact that this is a legal requirement. We suggest that the final plan include annual goals for completion of National Register nominations. Two nominations per cultural resource professional per year is a suggested minimum goal. The Plan should also make provision for repair of damaged sites, in accordance with Section 110. Again, goals and priorities should be outlined in the Plan.

33-6

33-6

As noted in 33-5 above, the current funding constraints on all Bureau programs make the setting of specific "nominations per year" type goals infeasible.

33-7

4. The Plan must provide for much stronger protection for cultural resources against ORV-caused damage. While ORV use is a valid land use, the proposed ORV use policy is not acceptable from the standpoint of archaeological site protection. Given the fragile nature of most archaeological sites, unregulated ORV use destroys sites. The Plan makes little provision for protecting sites, other than closing a few known archaeological sites. This is not adequate protection. Even under the conservation-oriented alternatives, the vast majority of the resource area would remain open to ORV use.

In accordance with Section 110 of the NHPA, the Bureau is required to exercise caution until comprehensive inventory, evaluation, and designation are completed for all lands. The proposed ORV plans fail to exercise such caution. ORV use is a non-site-specific undertaking which requires SHPO and Advisory Council consultation pursuant to Section 106 and 36 CFR 800. This has not yet been completed.

In addition to Section 106 consultation, the final Plan must include an analysis of ORV impacts to cultural resources. It must make provision for minimizing ORV damage to cultural resources, addressing survey needs, protection, and repair. We recommend that the surface of all archaeological sites be considered off-limits to ORV use. We also recommend that areas of known cultural resource sensitivity be designated off-limits to ORV use. Such areas should be identified in the cultural resource assessment. Such areas may include the Mesquite Ridge and Querecho Plains, drainages and playas. The Plan also needs to address cultural resource compliance for the two areas designated for intensive ORV use, Hackberry Lake and Alkali Lake.

33-8

33-9

5. The Plan needs to strengthen its cave management policy to provide for systematic inventory and protection of archaeological sites which may be

33-7 and 33-8

Current BLM policy requires that areas not designated as "limited" or "closed" be considered "open" unless a compelling resource protection need, user conflict, or public safety issue warrants a more protective designation. The majority of ORV use in the Resource Area occurs as part of oil and gas exploration and development activities and are now subject to the proposed process. Significant recreational ORV use will take place in the proposed intensive ORV use SMAs (Alkali Lake and Hackberry Lake) with impacts to cultural resources analyzed in site specific environmental assessments.

The issues you have raised on ORV designations have been discussed in the FEIS, Chapters 2 and 4. The cultural resource consultations for the Hackberry Lake and Alkali Lake ORV areas will be conducted as part of the activity plans for these SMAs.

33-9

The BLM is aware of the archaeological importance of cultural remains in caves. As these resources are discovered, appropriate protective measures will be applied according to the cave management program.

33-9

located in these areas. In general, the discussion of cave resources does not address the possibility of finding intact archaeological deposits. However, it is clear that vandalism is already occurring to the caves themselves. Any archaeological resources within these caves are open to similar damage.

Dry caves may provide excellent preservation of early archaeological remains. Additionally, caves have often been used for ceremonial purposes, with such use often occurring in very remote parts of the cave. The BLM is remiss in not providing for archaeological consideration of the caves, particularly when these areas are to be designated for substantial recreational use. An analysis of cave management must be included in the cultural resource management assessment.

6. All of the alternatives provide for considerable amounts of land to be transferred from federal ownership (approximately 10% of the resource area in Alternatives B, C, D and DI). Such transfer may result in adverse effects to cultural resources, since federal responsibilities for cultural resources are considerably more wide-ranging than State or local mandates. The Plan or supporting documentation should outline the measures that the Bureau will take to insure that archaeological sensitivity is considered at the earliest possible stage of land transfer planning.

33-10

33-10

Federal law prohibits the transfer of eligible cultural properties from federal ownership. Prior to all proposed land sales or exchanges, a cultural resource inventory will be conducted to establish the presence and eligibility of the cultural properties encountered in the affected land parcels. All proposed land disposal actions are subject to consultation as required by 36 CFR 800 and Programmatic Memorandum of Agreement (PMOA) between the BLM and the SHPO (NMSU-168).

33-11

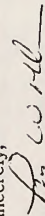
Documentation of specific measures to mitigate impacts to proposed recreation areas is beyond the scope of this RMP/EIS. Specific mitigative measures will be developed as part of the activity plans for these areas in consultation with the SHPO.

33-11

7. The proposed Plan provides for intensive recreational use of a number of areas within the resource area, but does not appear to consider potential impacts to cultural resources caused by more intensive use of such areas. The final Plan or supporting documentation should assess cultural resource impacts and outline measures such as inventory, fencing, patrols, education and stabilization that the Bureau will take in specific recreational areas to insure that cultural resources are not inadvertently impacted by recreational use. This is important, since a number of the proposed intensive recreational areas are also located in areas that are potentially archaeologically sensitive.

Prior Section 106 consultation is required for all actions which may be implemented upon approval of a land management plan. This includes non-site-specific undertakings. We appreciate the opportunity to comment. Let us know if you have any questions.

Sincerely,



Thomas W. Merlan  
State Historic Preservation Officer





Information: 505/835-5420  
Publication: 505/835-5410

**34**  
New Mexico Bureau of Mines & Mineral Resources  
Socorro, NM 87801

A DIVISION OF  
NEW MEXICO INSTITUTE OF MINING & TECHNOLOGY

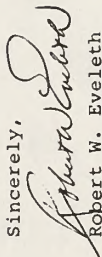
June 5, 1986

Charles S. Dahlen  
Area Manager, BLM  
Carlsbad Resource Area  
101 E. Mermod St.  
P.O. Box 1778  
Carlsbad, NM 88220

Dear Mr. Dahlen,

Enclosed are comments from various personnel at the New Mexico Bureau of Mines regarding the Carlsbad Resource Area, Resource Management Plan and Environmental Impact Statement. If I may be of further assistance please fill free to call on me or my colleagues.

Sincerely,

  
Robert W. Eveleth  
Mining Engineer

RWE/dg

Encl.

cc: File

P. S-1

34-1

Why only list oil, gas, and potash? Sand and gravel should also be listed. Furthermore oil and gas are not significant surface-disturbing activities. Very little acreage is disturbed. Nor does oil and gas production conflict with other authorized land uses, except perhaps some recreation.

P. S-3

Surface occupancy is needed in all areas including the Laguna Plata SMA. Increased costs and withholding land from mineral entry must be avoided.

P. S-6

Increasing acreage open to mineral leasing is desirable.

P. 3-8, 9

34-2

The report states there are no known metallic mineral occurrences in this area. However, uranium, copper, lead, and silver do occur. Perhaps the geologists need to take another look.

P. 4-48

34-3

Minerals--no significant impacts. This is not true. By withdrawing land there could be significant economic impacts--i.e. loss of jobs and revenue.

P. 4-50

34-4

Social and economic conditions--no significant impacts. Once again this is not true.

#### General Comments

34-5

It is great that they want to protect cave resources, but how much is this going to cost. Should caves be protected at the expense of valuable mineral production? Must we protect each and every cave.

34-6

It is interesting that several Texas local and regional agencies were on the mailing list, but not the New Mexico Bureau of Mines and Mineral Resources.

34-7

Table 3-10 P.3-36 clearly indicates that mining and oil and gas production yields more income than anything else. If we withhold more and more land from mineral entry and leasing, where does the money come from to support other nonmoney making ventures, such as caves? Table 3-11 P. 3-37 also indicates that alot of people are employed directly or indirectly by the mining and petroleum industries.

34-1

The Summary section of this Final RMP-EIS includes salable mineral materials with oil, natural gas, and potash development as significant uses of public lands. Although each drill pad and road right-of-way for oil and gas wells occupies only a few acres, the cumulative effects of increased human encroachment on wildlife habitats, the introduction of industrial uses into former open space rangelands, the potential for accidental pollution, and access and other use conflicts with grazing permittees requires energy and mineral resource management to be addressed as an issue in the Carlsbad RMP.

34-2

The DEIS, page 3-8, indicates that metallic minerals do not occur in abundance within the Resource Area.

34-3 and 34-4

The social-economic analysis of minerals resources has been expanded in Appendix E of the FEIS.

34-5

Caves are a potential hazard as well as a unique resource. Cave management partially mitigates the natural hazard and provides for the safety of other multiple use activities, such as location of oil and gas drilling pads. Management also provides for the protection and use of the cave resources. Impacts of cave management on minerals and energy industries are discussed in Chapter 4.

34-6

This was an oversight and the New Mexico Bureau of Mines and Mineral Resources has been added to the mailing list for the Final RMP/EIS and will be retained for future planning activities.

34-7

The BLM fully recognizes the importance of mining and oil and gas as both local and regional income producing industries. However, only slightly greater than 1.6 percent of the federal mineral base is proposed for No Surface Occupancy (none are proposed for No Leasing) under Alternative C for example. Of that area, many parcels are small enough to have minimal effect on drilling operations and others can be reached through directional drilling (see Appendix E of the FEIS). All resource programs are funded by appropriations by Congress.



Summary

P. S-1

Only O & G mineral exploration is explicitly called "surface-disturbing"; grazing has altered the surface appearance of the region far more.

**34-8** [P. S-4  
Alt. A]

Cave Resources: On what basis was an assumption of damage to caves from mining and blasting made?

**34-9** [P. S-8  
Alt. B]

Cave Resources: Far too restrictive to exploration/extraction of minerals. They suggest that additional "buffer" is needed!

**34-10** [P. S-9  
Alt. C]

Potash Sulfur is most likely in gypsum (yeso) areas such as Yeso Hills. O & G has a 300' cave protection radius proven ineffective?

**34-11** [P. S-11]

Now Karst is casually included with cave features. Karst and other features from dissolution of evaporites at depth is present over most of western Eddy County. Karst is too general a term to define non-use areas.

P. 1-6

Issue 2 O & G and potash are not the only activity that "sometimes" conflict with other uses. Grazing conflicts greatly over extremely large areas compared to very localized extractive activities.

P. 1-7

The statement at the top left column is a very harsh indictment of mining. The industry is accused of putting financial gain ahead of public health, etc.

In General:

O & G potash produce far more income than other activities, such as grazing, which actually is more damaging to the environment.

Comments by Ron Broadhead, Petroleum Geologist

The BLM Resource Management Plan for the Carlsbad Resource Area offers four alternatives for managing the use of federal lands within the resource area. Only Alternative A provides industry a reasonable amount of flexibility in the exploration for, and development of, oil and gas resources. Under Alternative A, 0.4% of federal land within the Resource Area will be withdrawn from oil & gas leasing. Under Alternative B, 20% of the federal acreage within the Resource Area will be leased for oil and gas only under special stipulations. Under Alternatives C and D, 22% of the Federal acreage within the Resource Area will be leased for oil and gas only under special stipulations.

The special stipulations vary in the adverse impact they will have on oil and gas exploration, but among the worst are

34-8

Many types of speleothems found in caves are subject to breakage and other damage caused by vibrations of the ground near their location. Heavy machinery operations or blasting could cause sufficient vibration to dislodge or alter delicate speleothems.

34-9

These caves have been identified as requiring intensive management practices to help resolve resource use conflicts. See response to comment 25-1.

34-10

The preferred alternative is changed to retain a minimum drilling distance of 300 feet from any known cave entrance, passage, or significant karst feature. However, this distance can be increased on a case-by-case basis if available information determines that there is potential significant threats to cave features.

34-11

The term karst is used to mean any cave opening or sink hole which is a significant source input for water recharge. Also included would be any known cave passage. The significance of each karst feature will be determined on a case-by-case basis with protective stipulations only applied as necessary to protect the specific resources.

those stipulations regarding no surface occupancy. A no-surface-occupancy stipulation in an area requires that any oil and gas resources be developed by wells directionally drilled from outside the area of no surface occupancy. This will have two adverse affects. First, it will increase the cost of wells by approximately 40 percent. At that increased cost, some oil and gas pools may no longer be economical to develop; therefore, both New Mexico and the federal government may lose a significant amount of income. Second, directional drilling stipulations may remove the possibility of developing shallow oil and gas pools in several parts of the Carlsbad Resource Area. Again, this could result in a significant loss of income to New Mexico and the federal government.

There are many areas in the Carlsbad Resource Area which will limit or prohibit the use of "off-road vehicles". If vehicles can not be used to conduct seismic surveys or to drill and service wells, then the area where off-road vehicles are not allowed will effectively be removed from petroleum exploration and development. It seems reasonable that oil and gas lease holders should have the right to explore for and drill for oil and gas on their leases.

Other lease restrictions (protection of cave resources, birds' nests, etc.) will effectively remove yet more area from oil and gas exploration and drilling. It would be interesting to calculate the percentage of the Carlsbad Resource Area will be effectively removed from oil and gas exploration activities.

I have some specific comments on the section Oil and Gas on p. 3-6.

- (1) Major future exploration targets in the Delaware Basin not mentioned are oil sands of the Delaware Mountain Group and oil sands of the Bone Spring Formation. Both of those stratigraphic units are significantly shallower (and therefore less expensive to develop) than the Morrow sands, which are the only target mentioned in the BLM report.
- (2) In southwestern Chaves County tectonic movements that formed the Sacramento Mountains have probably formed structural traps and may have lead to the formation, rather than destruction, of oil and gas accumulations.

Another comment I have concerns access issues in the report. There is no apparent section which states that access will be provided to facilitate the exploitation of oil, gas, and mineral deposits.

If the management plans in the report are instituted, the development of mineral resources in the Carlsbad Resource Area will take a back seat to every real and imagined environmental concern that may be raised. More jolly green bigots.

34-12

This additional information has been incorporated into the Carlsbad Resource Area planning record. There are additional possibilities for exploration and discoveries in Delaware formations; however, this does not change the area defined as "high" and "moderate" potential in the Carlsbad Resource Area.

34-13

In the description of the access issue on page 1-10, no distinction was made (or intended) as to the types of users that would be able to use existing or future access routes. Available access can be used by the mineral industry as well as other resource users.



General Comments of Michael Gobla, Manager  
Information, Resource, and Service Center

- 34-14** [ 1) Do we really need to protect more caves from mineral development when there is a National Park in the area for the same purpose.
- [ 2) The Bibliography makes heavy use of NMBMMR publications on geology and mineral resources yet the NMBMMR was not included on the mailing list of official reviewers (P.5-9). Who are the New Mexico state officials involved are listed on P. 5-4? This suggests the Bureau needs to take a more active role in the initial stages of preparing these plans.
- 34-15** [ 3) The Boundary of the Resource Area is different on Map A as compared to Maps B,C, & D and they are not the same scale!

34-14

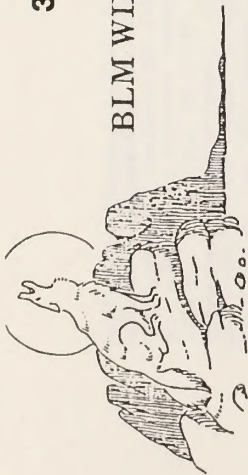
See response to comment 34-5.

34-15

See response to comment 34-6. The individuals listed on page 5-4 are BLM employees in the New Mexico State Office.

34-16

See response to comment 3-1.



35

NEW MEXICO  
BLM WILDERNESS COALITION

3005 Calle Quieta  
Santa Fe, NM 87505  
June 6, 1986

Charles S. Dahlen, Area Manager  
Carlsbad Resource Area, BLM  
101 E. Mermod St.  
P.O. Box 1778  
Carlsbad, NM 88220

Dear Mr. Dahlen;

Thank you for the opportunity to review the Carlsbad Resource Area's Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). After reviewing the draft RMP/EIS, the New Mexico BLM Wilderness Coalition offers the following comments.

Four wilderness study areas (WSAs); Mudgetts, Lonesome Ridge, Devil's Den and McKittrick Canyon, located in your resource area are part of the statewide wilderness study. As you stated, the draft RMP/EIS addresses management of these areas if they are not designated wilderness as a result of the statewide wilderness study. While we would like to see the areas designated wilderness, we feel the Special Management Area (SMA) plans in the document covering the WSAs are adequate to protect the natural characteristics of these unique areas. Our only concern is BLM's ability to adequately monitor the areas and enforcement the management plans with all the budget cuts BLM has had and may have in the future.

Sincerely yours,  
*Judy Bishop*  
Judith S. Bishop  
State Coordinator



## NEW MEXICO NATURAL HISTORY INSTITUTE

A Nonprofit Corporation

St. John's College Campus  
Santa Fe, New Mexico 87501

6 June 1986

Charles S. Dahlen, Area Manager  
Bureau of Land Management  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Draft RMP Comments

Dear Mr. Dahlen:

The intensive and enlightened planning effort recorded in the Draft RMP is admirable. We are a statewide group of biologists interested in protection of New Mexico's natural values, especially representative and unusual samples of the state's biological communities. (Thus we should be listed as a conservation group on p. 5-15 of the Draft, not on p. 5-10.) Our comments concern aspects of the Plan most closely related to those interests.

Land Tenure Adjustments. We favor extensive adjustments by trade with the state and, in a few instances, by trade with private owners: we object to sale of public lands. Although your proposed areas for disposal (Map B) appear sensible we would adjust certain boundaries. We think that land in the following areas should be retained: T19S R17E (contiguous sections of southeast  $\frac{1}{4}$ ) and T20S R16-17E, all of which are adjacent to other public lands including the Guadalupe District of Lincoln National Forest, which might come to BLM; T14-15S R18E, east  $\frac{1}{2}$ 's, contiguous to lands to be retained; T18S R21E, sections contiguous with public lands on west and south. Any lands with threatened species--notably cacti on lands northwest of Dunkin--should be offered only to a responsible organization that will protect the species.

Veretative Treatment. In general we are wary of both the poor economics and the ecological harm of chemical treatments. We have no objection to clearing shrubland (especially mesquite-dominated land) that has been degraded by grazing, where it can be done economically, especially by use of fire. We strongly oppose treatment of the shinners type, a natural community that is among the state's most productive habitats for wildlife.

Animal Damage Control. We object to the Bureau's routine approval of ADC agreements. Some allotments have had control every year for decades with slightly depressed coyote numbers the only result; coyote birthrates largely adjust for losses to killing. Non-target wildlife has taken a beating. The Bureau should take active control of ADC on public land (as the law requires) and limit operations to narrowly defined, practical goals.

Off-Road Vehicles. Special Management Areas 21 and 22--ORV playgrounds--are the right approach to ORV management. Other areas should be closed to off-trail travel, as (for instance) is already true in the new Rio Puerco RMP and in Chaves County.

Special Management Areas (SMAs). A lot of careful thought has gone into your proposals; we congratulate you. We endorse all but No. 14 of your 23 SMAs, mostly with enthusiasm (but see No. 22 below). Some individual

36-1

Areas for possible land tenure adjustment were selected primarily by township in order to alleviate the cumbersome and often erroneous identification by township, range, section, and quarter-quarter. Identification of lands in a township does not necessarily mean that all those lands will be disposed. Only those lands which meet disposal criteria, as stated in FLPMA, will be subject to possible disposal. In addition to that criteria, if a parcel of land contains other significant resources, i.e., cultural, 1&t species, critical wildlife habitat, or that could be better managed by BLM, it will not be sold or exchanged. This will be determined on a case-by-case basis. Significant blocks of BLM lands which are contiguous to other blocked federal lands will likewise not be sold or exchanged.

36-2

The Bureau will continue to work with agencies under Cooperative Agreement and Memorandums of Understanding through the guidance of the Animal Damage Control Act of 1931.



comments:

No. 2(f), Chosa Draw Cave Complex. ("...Caves Complex"?--one does not speak of a "bricks road" or a "buildings complex.") Alternative D's greater acreage protection, especially for O & G activities, seems vital to the purposes of protection of caves and of surface fauna.

No. 3, Texas Hill RNA. Alternative D's buffer zone at the north end seems a good idea; as much of this small watershed as is practicable should be included. Even more important is to trade for the state's Section 16, to include the northwest part of the canyon.

No. 4, Dark Canyon. Acquisition of the lands and mineral rights indicated is especially needed in this important proposal.

No. 5, Lonesome Ridge. Alternative C's strong protection is much to be preferred over B's for this fragile, scenic area with its many rare plant and animal species.

No. 6, Springs Riparian Habitat. To our knowledge this proposal is a first--to protect all suitable spring areas--and much to be praised. The 480 surface acres and 200 mineral acres to be acquired at Blue Spring are the most vital of all acquisitions in the Draft. (There is minor confusion in numbering; for instance "6(b)" of p. E-31 is "6(c)" of Map D.)

No. 7, Yesso Hills ACEC and RNA. Alternative D's protection against entry for solid and leasable minerals and rights-of-way should be extended to the 5460 acres. (On p. E-36 under "C--Prescriptions," "T255" should read "T265.")

No. 10, Laruna Plata Archaeological District. Some attention to natural as well as cultural values should be given in management plans. Acquisition of the state's Section 2 is important for natural values.

No. 11, Maroon Cliffs. Acquisition of the 1606 acres of state land should be given higher priority.

No. 13, Los Medanos Raptor Area. We praise the innovative regulations proposed. A most important addition is to restrict ORVs to designated routes, year-round, to protect certain cacti and other rare plants as well as raptors. Other surface-disturbing activities should also be controlled carefully in regard to cacti as well as raptors.

No. 18, Pecos River-Canyon Complex. This is an unusual, bold, excellent proposal. Acquisition of 960 acres is important to the integrity of the proposal. Alternative D's slightly more stringent requirements are better than C's, especially in regard to mineral entry and visual resource management. Location of the RNA should be shown on p. E-66.

No. 20, Guadalupe Escarpment Scenic Area. This is another outstanding proposal. But ORV management in the preferred alternative is disappointing; only Alternative D's plan fits with the proposal's objectives.

No. 22, Hackberry Lake ORV Area. We nominated part of this area for intensive ORV use, and we stand by that. But our intention was that

36-3

The map titles for Preservation Spring, SMA No. 6(b) and Cottonwood Spring, 6(c) were reversed in the Draft RMP-EIS. The information included in Appendix E is correct.

36-4

The acreage for the Yesso Hills SMA and RNA have been revised and described in the FEIS, Chapter 2 and Appendix E.

36-5

Under current management, ORV use does not create conflict with the rare plants and raptors. If monitoring shows that ORV use is detrimental to these resources, a limited and/or seasonal restriction will be imposed as necessary to protect these values.

36-6

The RNA has been included on a map in the FEIS Appendix E.

36-7

See response to comments 19-2 and 29-1.



36-7

ORV intensive playgrounds would be created in exchange for restrictions of ORVs to roads and trails on the rest of the Resource Area. We are disappointed that this reasonable trade-off is ignored in the Draft. We urge that the general restriction be imposed to protect soil, vegetation, and wildlife from disturbance; 57,000 acres of playground make an ample sacrifice area. (Incidentally, the name "Hackberry Lake" does not indicate the rugged nature of most of the intensive use area. How about "Loco Hills" or "Dunes" or "Nimnim Ridge"?)

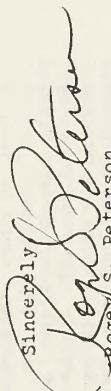
36-8

No. 23, Pecos River Corridor. An ambitious, excellent plan, which would be improved by ORV restrictions. Native vegetation is unlikely to recover in the presence of livestock along the river.

36-9

We continue to be disappointed that the Roswell District--only public proprietor of extensive Southern Great Plains grasslands--has utterly failed to protect so much as an acre of that ecosystem. At least the intention to locate and protect a grassland RNA should be stated in the final plan. As we did in 1984, we propose that an area on Reagan and Upland loam, near Hope, be selected.

But other than a grassland RNA and the failure regarding off-road vehicles, we thank you for the fine plan.

Sincerely,  
  
Roger S. Peterson  
Secretary

36-8

Through proper grazing management practices, native riparian vegetation along the Pecos River can be managed in concert with livestock grazing. Such practices could include proper salt and mineral placement, herding practices, and proper rest through pasture deferment.

36-9

At present, the BLM is not aware of a good representative of Southern Great Plains grassland that should be designated an RNA within the Resource Area. Should information and data in the future change this, we would consider and analyze possible designation of the area.

37

## STATE OF NEW MEXICO

OFFICE OF THE GOVERNOR

SANTA FE

87503

TONEY ANAYA  
GOVERNOR

Mr. Charles Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

This letter and the enclosed comments constitute the official State Process Recommendation on the Carlsbad Resource Area Draft Resource Management Plan and Environmental Impact Statement. The Natural Resources Department has acted as coordinator in securing and summarizing responses from several state agencies including the Department of Agriculture, the Historic Preservation Division of the Office of Cultural Affairs, the Energy and Minerals Department and the Game and Fish Department. Comments from the Environmental Improvement Division are being sent under separate cover.

Overall, the draft plan you have prepared is well thought out and written. Our comments reflect general support for Alternative "C", the Preferred Alternative (PA). However, a number of the agencies, reviewing the documents from the perspective of their own statutory mandates and technical competence, have found some of the data and analysis supporting evaluation of the alternatives and choice of the PA to be inadequate. Several of the agencies' questions reflect specific concerns, and their comments contain recommendations for additional research and analysis that would be likely to strengthen the PA when the final Resource Management Plan is developed.

The State of New Mexico looks forward to receiving a final EIS and Plan which responds to each of these concerns. Please contact the lead agency (Natural Resources Department 827-7861) if you have any questions about the enclosed material. We appreciate this opportunity to work with you in long-term planning for the management of the many resources of the Carlsbad Resource Area.

Sincerely,

TONEY ANAYA  
Governor

TA/jb/jdv

Enclosures

June 5, 1986



TONEY ANAYA  
GOVERNOR

STATE OF NEW MEXICO  
NATURAL RESOURCES DEPARTMENT

Santa Fe 87503  
(505) 827-7835

LEO GRIEGO  
SECRETARY

May 27, 1986

TO: John Brown, Department of Finance and  
Administration/Governor's Clearinghouse

FROM: Leo Griego, Secretary

SUBJECT: Carlsbad Resource Area (BLM) Resource Management  
Plan and Environmental Impact Statement

As lead agency, we are submitting these draft comments from the following agencies: Natural Resources, Agriculture, Cultural Affairs, and Energy and Minerals.

There is a general consensus to support the Preferred Alternative. Each agency has explicitly stated its concerns and recommendations to the Bureau of Land Management. Very few inter-agency conflicts appear in these comments. Dave Miller can discuss these with you before the packaged comments are sent to BLM. Contact me or my staff if I can be of further assistance and please keep me informed of BLM's response to our State comments.

Attachments

"The Natural Resources Department is An Equal Opportunity Employer"



CARLSBAD RESOURCE AREA RMP-EIS COMMENTS

Issue No. 1.	Land Tenure Adjustments  No comments.	
Issue No. 2.	Minerals and Energy Resources  See attached comments of EMD.	
Issue No. 3.	Rangeland Resources  The New Mexico Department of Agriculture under separate cover has submitted its comments and recommendations on the Carlsbad Resource Plan and Environmental Impact Statement. We have attached a copy of their comments in this package for your review and files.  Their comments focus on livestock grazing issues. In addition to these range-related comments, we offer these additional comments:  A. What rangeland monitoring of grazing systems will BLM conduct? At a minimum, will monitoring data include data on actual livestock use, wildlife use, key forage species utilization rates, and rangeland condition and trend?  B. Regarding range improvements, will all range improvement funds be subjected to an economic analysis that results in a final prioritized ranking of allotments that relates to activity plans?  C. Within the proposed range improvement budgets, what percentage will be expended on maintenance of existing range improvements? On new roads?  D. With regard to the vegetative treatment project, please specify acreages, target species, monitoring, application guidelines, chemicals to be used, and a table showing a cost-benefit ratio for the project.  E. In the discussion of water resources at 3-10, we request information on the following: 1. What are the major problems associated with water resources in the	37-1 See page 2-10 and Appendix D-5 of the DEIS.  37-2 See page 2-11 of the DEIS.  37-3 Alternative A proposed that approximately 10 percent of the range improvement funds will be expended on the maintenance of existing vegetation treatments. Under Alternatives B, C, and D, approximately 2-5 percent of the range improvement funds will be expended on the maintenance of existing vegetation treatments. At this time no range improvement funds have been made available for new road construction.  37-4 See page 2-8 and Appendix U-7 of the DEIS. The DEIS did not analyze site-specific areas for vegetation treatment; rather, it did analyze areas with the highest potential for vegetation treatment. Site-specific environmental assessments and cost-benefit analyses will be completed prior to vegetation treatments.
37-1		
37-2		
37-3		
37-4		
37-5		

37-5

resource area? (sediment and floodwaters?)

2. What are the primary uses of water on the rangelands? Have human water uses in towns been considered?

37-5

F. At Appendix D-F (Typical Range Improvements) under non-structural improvements, we propose to add the range improvement alternative named "imprinting." We have attached a copy of a U. S. Department of Agriculture-sponsored research on imprinting by Robert Dixon. We request a response to it as an alternative and inclusion in the final Resource Area Plan.

37-6

Wildlife as a Rangeland Resource

See attached comments of Game & Fish

Issue No. 4. Special Management Areas

We support Alternative C, the preferred alternative. Specifically, we support the designation of all six ACEC's analyzed under the preferred alternative. The Chosa Draw Caves Complex ACEC would consolidate surface ownership of an extensive gypsum cave complex and help assure adequate protection. In addition, we support the preferred alternative analysis and designation of the Guadalupe Escarpment SMA #20 and the National Natural Landmark designation for McKittrick Hill Caves Complex. Likewise, we support the preferred alternative designation of the five Research Natural Areas including Dry Cave, South Texas Hill Canyon, Yesso Hills, Little McKittrick Draw, and the Pecos River/canyon Complex.

Cave Resources

Page 3-27 "Caves" states: "Caves in the area are protected by a special stipulation to oil and gas activities requiring that no drilling occur within 300 feet and no two pits be located within 600 feet of a known cave entrance or passage." In telephone communication with BLM personnel, the Department was informed that this statement was a misprint and should be corrected to give a 450 foot buffer from all drilling activity instead of 300 feet for Alternative C. Further, the actual measurement of the buffer is to be made from any cave entrance, aspect, or surveyed passage. These amendments to the actual language in the document are important for additional protection and this language should

37-7

Major problems are sedimentation, generally poor water quality and lack of adequate groundwater supplies. The primary uses of water on public land are for livestock and wildlife consumption and oil and gas development (see DEIS page 3-11). Federal law requires protection and enhancement of water resources which would include domestic use (see DEIS page 2-8). Refer to the discussion in Minerals and Energy Resources pages 2-5 for a discussion of mineral related regulations designed to protect water resources.

37-6

The list of practices in Appendix D-7 of the DEIS was not intended to be all inclusive. Imprinting has been added to the list of potential range improvement practices in the Carlsbad Resource Area (see FEIS, Appendix, Additions and Corrections to the Draft). Your enclosures on Land Imprinting will be kept on file in the Resource Area office for reference.

37-7

"No two pits" has been corrected to read "no fluid pits" (see FEIS Chapter 3). Currently, 300 feet is the closest distance which oil and gas drilling operations may be conducted from any known cave entrance, passage, or significant karst feature or aspect, unless otherwise modified by the BLM authorized officer. In Alternative C of the draft RMP/FEIS, oil and gas drilling would be prohibited within a minimum of 450 feet from any known cave entrance passage or significant karst feature or aspect, and under Alternative D, a minimum of 600 feet. This has been changed to retain the current 300 feet minimum buffer zone (see FEIS Chapter 2). However, additional buffers could be required on a case-by-case basis if circumstances dictate the need to protect identified cave resources. Also see response to comment 34-10.



be mandatory. Further, the 600 foot buffer proposed under Alternative D should be incorporated into Alternative C. This 600 foot buffer should be considered the absolute minimum and may not be adequate in all cases to protect cave resources or the caving public. The BLM states this in the document. The 600 foot buffer may be inadequate because all passages of a given cave may not be discovered and surveyed. Also, a cave survey can only be conducted in passageway large enough to accommodate a human. Much smaller passages compose the majority of a given cave complex and these passages can't be surveyed. These smaller passages radiate out from an entrance or a surveyed passage for great distances, easily further than 600 feet. These smaller passageways contribute to the overall cave environment through air flow, ambient temperature, hydrology, etc., and they are integral to the system. A given cave is influenced by its entire complex of passageways; thus, it is important to protect the entire complex of passages. The BLM should consider extending these distances beyond the 600 foot buffer for cave complexes that are not protected by ACEC, SMA, or other special provisions.

For conservation reasons, undiscovered and unknown caves should also be protected from damage occurring through oil and gas drilling and exploration. Unknown caves may contain paleontological and archaeological artifacts as well as resources commonly associated with caves. Drilling rigs do encounter unknown passage in the process of exploration and BLM has documented cases of drilling muds, cements, gravels, etc., being unintentionally pumped into cave passage in an attempt to develop a well. These compounds obviously flow into and destroy cave environs. The BLM needs to develop additional regulations for drilling procedures to protect unknown caves in the event of such an occurrence.

On Page 3-20, the document states that Yellowjacket/Lair Cave is ungated and that the cave is used by bats. This cave should be gated and use restricted to protect bats during their seasonal activity in the cave.

The Department supports the existing management policies for cave resources as they are applied to the caves in the Carlsbad Resource Area. We recognize that recent efforts by BLM have contributed to improved cave protection. This document with the proposed amendments to

Encountering voids while drilling for oil and gas has created problems in specific areas within the cave resource primary occurrence zone. This problem is expected to become more acute as drilling activity intensifies in this region. The proposed plan provides some protection for significant voids encountered within the cave resource primary occurrence zone. The drilling operators and lessees must be aware of the geologic hazards associated with karst areas and responsible to correct any drilling problems from encountering voids. See FEIS Chapter 2 for expanded discussion.

Alternative C (the preferred alternative) will further cave protection goals.

#### Threatened and Endangered Species

The list of rare plant species shown at Appendix D-13 is correct. We support BLM's approach to rare plant species stated at 4-38. These rare species and their habitat require full protection and a plan that improves their habitat through recovery plans, surveys, and protection of candidate species. Our Department's Heritage Program can assist BLM in these efforts.

#### ORV's

Our Department supports opportunities for ORV recreation in the 2.2 million acre Carlsbad Resource Area. Alternative D offers the best balance of resource conflicts. By closing about the same areas to ORV's as the preferred alternative, it is Alternative D that "limits" ORV access to sensitive resource areas such as the Los Medanos Raptor Area, San Simon Pronghorn Habitat, and the Guadalupe Escarpment. By limiting ORV use, BLM will decrease the loss of soil productivity from compaction and erosion and protect cultural resources until a comprehensive cultural site inventory is completed. These limitations would have little impact on ORV recreationists because the most popular spots would remain "open" and the plan still allows for two designated ORV-intensive use areas at Hackberry and Alkali Lakes.

#### Cultural Resource issues in Special Management Areas

See attached comments of the Office of Cultural Affairs.

Issue No. 5. Access

No comments.



NEW MEXICO DEPARTMENT OF AGRICULTURE  
DIVISION OF AGRICULTURAL PROGRAMS AND RESOURCES  
Box 5702/Las Cruces, New Mexico 88003  
Telephone (505) 646-3642



May 7, 1986

03.67 ltr.dahlen.charles.s

Mr. Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
101 East Mermod Street  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

We have completed our review of the Carlsbad Resource Area (CRA) Resource Management Plan and Environmental Impact Statement (RMP/EIS). This letter and the enclosed review and analysis document will serve as comments on that document.

Our analysis of the RMP/EIS has focused primarily on the issue of livestock management in the CRA. In general, we have found the RMP/EIS to be an acceptable environmental analysis and planning document. However, we have noted a number of deficiencies that impair the overall quality of the RMP/EIS. These deficiencies and our recommendations for their correction are presented in "A Review and Analysis of the Carlsbad Resource Area Draft Resource Management Plan and Environmental Impact Statement".

Thank you for the opportunity to review and comment on the CRA RMP/EIS. If further clarification is required concerning our comments and recommendations, please contact me or Mr. Ronald J. White, director of the Agricultural Programs and Resources Division of the New Mexico Department of Agriculture.

Sincerely,

*W.P. Stephens*  
William P. Stephens  
Director/Secretary

WPS/kb

Enclosure: A Review and Analysis of the Carlsbad Resource Area Draft Resource Management Plan and Environmental Impact Statement

STATE OF NEW MEXICO



# Department of Agriculture

GOVERNOR'S CABINET

TONEY ANAYA  
Governor

Box 3189, NMSU Campus  
Las Cruces, New Mexico 88003  
Phone: (505) 646-3007

WILLIAM P. STEPHENS  
Secretary

May 7, 1986

03.67 ltr.griego.car.rmp.eis

The Honorable Leo Griego  
Secretary of Natural Resources  
Villagra Building, Room 121  
408 Calisteco Street  
Santa Fe, New Mexico 87503

ATTENTION: Mr. David Miller

Dear Secretary Griego:

Enclosed are our comments on the Carlsbad Resource Area Draft Resource Management Plan and Environmental Impact Statement and the letter transmitting those comments to Mr. Charles S. Dahlen, area manager, Carlsbad Resource Area.

If there are questions, or if we can assist you, please let me know.

Sincerely,

*W.P. Stephens*  
William P. Stephens

WPS/kh

Enclosures: A Review and Analysis of the Carlsbad Resource Area Draft Resource Management Plan and Environmental Impact Statement  
Letter dated May 7, 1986, to Mr. Charles S. Dahlen, Carlsbad Resource Area Manager, Bureau of Land Management, from William P. Stephens, Director/Secretary, New Mexico Department of Agriculture

May 7, 1986

03.40 carlsbad.rmp.eis

**A Review and Analysis of the Carlsbad Resource Area Draft  
Resource Management Plan and Environmental Impact Statement**

**The Livestock Grazing Issue**

**Introduction**

The following text addresses the actions, concerns, and issues presented in the Carlsbad Resource Area (CRA) Draft Resource Management Plan and Environmental Impact Statement (RMP/EIS) which impact livestock grazing in the CRA. The analysis and comments provided below are concerned only with the salient technical points of the RMP/EIS and are intended as contributions toward rather than detractions from the professionalism of that document.

**I. Livestock Grazing Impacts**

The analysis of Alternative D1, the No Grazing Alternative, is predicated on the assumption that livestock grazing per se involves unavoidable resource damage. For example, the Bureau of Land Management (BLM) notes that cessation of livestock grazing would eliminate the adverse grazing impacts of "...compaction, reduction of litter, [reduction of] organic matter, and the deterioration of plant root structure" (RMP/EIS, p. 4-44). Yet, the adverse environmental impacts associated with grazing under Alternative D1 contradict planning criteria assumptions stated in the RMP/EIS and lack substantive scientific validation.

The BLM states that "Planning criteria for rangeland resources is based upon the assumption that livestock will be managed to utilize available forage and maintain forage vigor without degrading wildlife habitat, watersheds, or range productivity" (RMP/EIS, p. 1-8). However, if the assumptions of Alternative D1 are correctly stated and do express the BLM viewpoint on domestic livestock impacts, there appears to be a serious contradiction between the BLM's management philosophy and its management implementation in regard to livestock grazing on public lands. On the one hand, the BLM's planning criteria is based on the management objective of nondegradation of range productivity. On the other hand, the BLM's analysis of Alternative D1 assumes that degradation of range productivity is inevitable to some degree under all alternatives permitting livestock grazing.

We believe an assumption of this nature is scientifically insupportable, misleading, and erroneous. Improper grazing management can result in the degradation of range productivity. However, grazing per se or properly managed grazing (whether by livestock or wildlife) infers no

37-9

The No Grazing Alternative D1 is required by court agreement MKUC vs. Model et. al. for the purpose of analysis and was not intended to be a benchmark against which all other alternatives would be compared. Page 4-45 of the D1S states that due to site limitations, precipitation, and present species composition, some plant communities would probably not improve through the total removal of domestic livestock and through natural processes alone.

37-9



inevitable degradation of range productivity. We remind the BLM that most range plant communities coevolved with herbivores. Grazing in these ecosystems is not only natural but, in our opinion, vital to the maintenance of those ecosystems. If degradation of range productivity, as inferred by Alternative D1, occurs under other RMP/EIS alternatives, we must conclude it is the result of improper resource management by the BLM and not the presence of livestock alone (or, for that matter, wildlife).

Accordingly, we recommend the BLM modify Alternative D1 to eliminate all unsubstantiated claims or inferences that livestock grazing, irrespective of management, results in adverse environmental impacts on rangeland productivity. If the BLM selects not to eliminate such references, we recommend the planning criteria on page 1-8 of the RMP/EIS be appropriately modified.

## II. Soil and Water Resources

The RMP/EIS is introduced by a summary of the management alternatives which are presented and developed more fully in the body of the text. The issue of soil and water is included in the discussion of rangeland resources for each summarized alternative. Under Alternative A, it is stated that the current downward trend in soil and water conditions is the result of mineral and energy development. However, the summarized discussions of the soil and water issue for Alternatives B, C, and D, state only that "loss of soil productivity, increasing erosion, and sedimentation would continue over most of the CRA [Carlsbad Resource Area]" (RMP/EIS, p. S-10). Although Chapter 4, "Environmental Consequences", clarifies the cause of soil resource degradation in all alternatives to be mineral and energy development, the overall impression generated by the summarizations of Alternatives B, C, and D, is that livestock grazing is the causative factor. This misconception is facilitated by the inclusion of the soil and water issue under the category of "Rangeland Resources" and not "Minerals and Energy".

We believe it is important the BLM correct this source of potential misconception. Many readers from the general public will examine only the summary of alternatives, not the detailed discussion of alternatives and their impacts presented elsewhere in the RMP/EIS. Accordingly, we recommend the BLM either modify soil and water discussions for the summarizations of Alternatives B, C, and D, to clearly state the source and cause of soil resource degradation or transfer the discussion of soil and water to the "Mineral and Energy" section of each alternative analyzed.

37-10

The summary has been revised to correct the possibility of this misconception (see FEIS Summary, Additions and Corrections to the Draft).

### III. The No Grazing Alternative

The BLM has included in the RMP/EIS Alternative D1 the "No Grazing Alternative." The stated purpose of developing this alternative was to "...analyze the affects [sic] of eliminating all domestic livestock from the 174 allotments totaling 965,000 acres west of the Pecos River" (RMP/EIS, p. S-16). We recognize the mandate of the BLM under the National Environmental Protection Act to consider and develop a full range of alternatives. We are perplexed, however, by the BLM's failure to develop a "No Mineral-Energy Development" Alternative.

The inconsistency evident in the BLM's omission of such an alternative is particularly alarming in view of the severity of resource impact occurring under mineral and energy development as compared to livestock grazing. In all RMP/EIS alternatives, mineral and energy development results in varying degrees of soil productivity loss and increased erosion. In contrast, livestock grazing under Alternatives A, B, C, and D, results in stabilized to improved vegetative cover and soil productivity and reduction in soil erosion.

We acknowledge that significant societal costs would be associated with termination of mineral and energy development in the CRA. Although termination would have ramifications for the nation and the region, the impact on individual mineral and energy workers would be no more severe than the scenario facing ranch owners and employees resulting from cessation of all domestic grazing activity. We also realize that mineral and energy development generates greater amounts of wealth than livestock production. We would assume, however, the relatively greater generation of wealth by a particular resource activity would not be viewed by the BLM as a rationale or justification for resource degradation. Accordingly, we recommend livestock grazing and mineral-energy development be granted equivalent treatment in the development and analysis of management alternatives. If a "No Grazing" alternative is included in the final RMP/EIS, a "No Mineral-Energy Development" alternative should also be presented. If this occurs, we believe the draft document may have to be reissued for public review.

### IV. Soil and Water Guidelines

The discussion of alternatives in Chapter 2 is preceded by the presentation of management guidelines that are to remain in effect regardless of the management alternative selected for implementation (RMP/EIS, p. 2-3). One of the guidelines concerns the conservation of soil resources. It states that "Soils will be managed to maintain productivity and to minimize erosion" (RMP/EIS, p. 2-8). Yet, in Chapter 4, "Environmental Consequences", the implementation of all alternatives results in varying degrees of continued "long-term loss of soil productivity, increasing erosion, and sedimentation..." (RMP/EIS, p. 4-28). We request the BLM explain this discrepancy between management guidelines and actual management impacts on the environment.

37-11

The No Grazing Alternative, D1 is required (see response to comment 37-9). A No Mineral-Energy Development alternative is not a requirement within the planning process.

37-12

It is expected that large amounts of land will continue to be disturbed due to energy and mineral development in the Resource Area. It would be impossible to mitigate all the adverse effects to soil resources resulting from this development in most of the Resource Area. Special Management Areas would receive greater protection; however, they only constitute a small percentage of the Resource Area.

37-11

37-12





#### V. Temporary, Nonrenewable Forage Allocations

Chapter 4, "Environmental Consequences", is prefaced by an introductory discussion on the "Assumptions for Impact Analysis". One of the assumptions states that "Additional forage will be authorized for use on a temporary, nonrenewable basis for livestock only if it is determined through monitoring studies to be permanently available on a sustained yield basis" (RMP/EIS, p. 4-2). This assumption is not in compliance with BLM grazing regulations (43 CFR Part 4100).

Specifically, Regulation 43 CFR 4110.3-1 stipulates that additional forage may be allocated on a nonrenewable basis when it is temporarily available within an allotment. No mention is made in the regulation that the temporary, nonrenewable allocation of forage must be shown "...through monitoring studies to be permanently available on a sustained yield basis". In actuality this defies logic. If the forage is permanently available, why would it be allocated only on a temporary basis? Accordingly, we recommend the BLM modify the RMP/EIS assumption on temporary, nonrenewable forage allocation to correspond with existing rules and regulations.

37-13

37-13

The paragraph has been changed to read, "Additional forage will be authorized for use on a temporary-non-renewable basis until, through monitoring studies, it is determined to be permanently available on a sustained yield basis." This change has been made in FEIS Chapter 4, Additions and Corrections to the Draft.

#### VI. Animal Unit Month (AUM) Reductions

Implementation of Alternative C, the BLM's preferred alternative, would necessitate "...an initial reduction of 24,859 Animal Unit Month's (AUM's) on all allotments" (RMP/EIS, p. 5-10). The reduction, according to BLM figures, corresponds to the average amount of nonuse below preference that has occurred over the past five years. The BLM further states that proper carrying capacity will be determined by monitoring actual livestock use and resulting levels of utilization (RMP/EIS, p. D-4). Additionally, the BLM confirms that "...all livestock use adjustments will be determined through monitoring and implemented through documented mutual agreement or by decision" (RMP/EIS, p. 2-10).

Accordingly, we have the following questions and recommendations concerning the initial reduction of 24,859 AUMs. The estimated initial allotment carrying capacities in Appendix D were derived from five year average actual use data collected by BLM range staff. Will the estimated initial carrying capacities derived from actual use on allotments running below preference be mandatory for permittees upon finalization of the RMP/EIS or will permittees be allowed, at their discretion, to stock at preference pending completion of monitoring and analysis of the appropriate data? Or, will estimated initial carrying capacities replace current preferences until monitoring is completed and data analyzed?

We recognize the mandate of the BLM to manage the range resources for optimum productivity and sustained yield. However, we also recognize the losses in equity that can occur to permittees when preference is

37-14

37-14

See response to comment 19-1.



adjusted downward. Also, the initial estimated allotment carrying capacities do not necessarily reflect the biological carrying capacity of allotments over the last five years. Due to the severe financial status of the agricultural industry, five year average stocking rates may have been predicated more on economics than biological considerations. Therefore, we recommend the BLM forestall preference adjustments until monitoring is completed. We also recommend that the estimated initial carrying capacities of Appendix D not be made mandatory during the interim period in which data are collected for the quantification and refinement of carrying capacity estimations.

#### VII. Range Trend Projections

The RMP/EIS reports ecological condition of rangelands in the CRA for the period of 1983-1984 (p. 3-13). Trend information is not provided for these same rangelands. However, the BLM does project range trend for the long-term (10-20 years) for each of the alternatives presented in the RMP/EIS (pp. 4-8, 4-28, and 4-38). We would like to know how the BLM arrived at these projections without the availability or use of preexisting trend data. In our opinion, quantitative prediction of the rate of change between range condition classes for specific range sites cannot be made without such data.

For example, the BLM projects that range condition under Alternative A, the No Action Alternative, will stabilize or deteriorate slightly over the long-term. Range conditions under Alternatives B, C, and D, are projected by the BLM to improve by varying degrees during the same time period. Information of this type is critical for evaluating an alternative and selecting an alternative for implementation. Consequently, range condition projections should be included in the presentation and analysis of alternatives only if their credibility and reliability can be reasonably established.

We believe the BLM has failed to provide scientifically acceptable justification and support in the RMP/EIS for these projections, particularly in view of the conspicuous absence of actual trend measurements. Accordingly, we request the BLM provide or reference the data base from which these projections were formulated. If a supporting data base is unavailable, we recommend the BLM exclude from the final RMP/EIS the unsubstantiated and perhaps misleading projections of range condition change which are currently presented in the draft RMP/EIS. In our opinion, the adoption of generalized and subjective indicators of the direction and magnitude of projected range condition changes would be an adequate and professional option to the existing projections in the RMP/EIS. If adopted by the BLM, this approach, albeit explicitly subjective, would provide the public with a more reasonable and objective basis upon which to judge all alternatives in the CRA RMP/EIS.

37-15

Permanent trend plots were established and apparent trend data was collected in 1982-83 on those grazing allotments west of the Pecos River. Trend data is an important element in the overall monitoring program and will be an important indicator used in the monitoring evaluation process at the end of the five-year monitoring program. Two years of trend data is insufficient to make projections on desert ecosystems that change very slowly over time. Therefore, ecological vegetation condition was used to project changes in the rangeland vegetation resource.

A Review and Analysis of the CEA Draft RMP and EIS

May 7, 1986

Page 6

VIII. Wildlife Considerations

A major assumption in the RMP/EIS (p. 4-3) is that wildlife numbers are currently limited by habitat and any habitat improvements will automatically result in wildlife population increases. We feel this assumption is unreasonable unless the BLM has specific information to support it. Under Alternatives B, C, and D it is implied that livestock grazing reductions will be followed by increased numbers of big game. In the absence of data showing that habitat is the current limiting factor for big game numbers, the most that can be said is that wildlife habitat may improve following livestock grazing reductions, depending on range site potentials.

37-16

On pages 3-19 and 3-22, rabbits (i.e., jackrabbits and cottontail rabbits) are referred to as game animals. These species are not game animals under current New Mexico law.

37-17

IX. Animal Damage Control (ADC)

We are pleased to see that ADC is acknowledged in the RMP/EIS (p. 2-11) as a necessary wildlife management tool on public lands. However, we believe the BLM should mention in the RMP/EIS that interagency procedures exist between the BLM, U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), New Mexico Department of Game and Fish, and NMMA for professional development of annual plans for conducting ADC.

37-18

Alternative D1 proposes the elimination of livestock grazing in the CEA. On page 4-45 under this alternative it is stated that wildlife species favoring higher successional stages would increase over the long term. This statement is correct only if habitat is a limiting factor. On page 4-46 it is stated that "increased mule deer and pronghorn numbers may increase the demand for public access". Many ranchers in the CEA currently conduct predator control or receive the services of the APHIS/NMMA Cooperative ADC program to control predation on their livestock. Another benefit of this control is reduced predation on big game, particularly fawns of mule deer and pronghorns. Although it is unknown whether this benefit is significant in this particular area, we feel it should be pointed out in the RMP/EIS that elimination of livestock grazing may not result in increased big game numbers if the concurrent elimination of predator control activities results in accelerated fawn predation. There is evidence reported in the literature that suggests predation can reduce deer and antelope population levels or maintain them at low levels.

37-19

37-16

Publications are available relating the Southwestern U.S. wildlife population limitations to habitat quantity and quality. Wildlife includes all faunal biomass, not only big game species; and as a whole the biomass will increase.

37-17

Game animals are properly addressed in the DEIS Chapter 3.

37-18

Your comments have been included in Chapter 2 (see FEIS, Chapter 2, Additions and Corrections to the Draft).

37-19

Theoretically, big game numbers would initially increase in response to the increase of available habitat resources. The predator base would then increase correspondingly and a cycle would eventually be established (see response to comment 37-16).

KH/cfp





TONY ANAYA  
GOVERNOR

STATE OF NEW MEXICO  
**ENERGY AND MINERALS DEPARTMENT**  
525 Camino de los Marquez  
Santa Fe, New Mexico  
87501

May 20, 1986

M E M O R A N D U M

TO: DAVID MILLER,  
Natural Resources Department

FROM: PAUL L. BIDERMAN,  
Secretary *Paul Biderman*

SUBJECT: BLM'S DRAFT RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT  
STATEMENT (RMP/EIS) FOR THE CARLSBAD RESOURCE AREA

In response to your request for comments on the above-referenced document, I offer the following on behalf of the Department. These comments pertain primarily to energy and mineral resource development issues.

GENERAL

The management alternative selected by the BLM as its "preferred" alternative, i.e., Alternative C, appears to offer a reasonable compromise between resource utilization and conservation. If this alternative is ultimately adopted for implementation, it is likely that energy and minerals development will not be adversely impacted to a significant degree. It should be noted, however, that the development of oil and gas resources will be adversely affected to a far greater extent than that of other resources (e.g., potash, sand/gravel) in the Carlsbad Resource Area.

Indeed, the acreage for which special stipulations are proposed will more than double, from 236,365 to 597,068 acres. Because of the substantial

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37-20

The impact analysis of SMA restrictions on oil and gas development has been expanded in FELS Appendix E. The SMA stipulations have been further analyzed and rationale expanded and available for review at the Carlsbad Resource Area.

OFFICE OF THE SECRETARY  
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ADMINISTRATIVE SERVICES DIVISION 15051827-5325  
CONSERVATION & MANAGEMENT DIVISION 15051827-5360  
MINING & MINERALS DIVISION 15051827-5370  
RESOURCE & DEVELOPMENT DIVISION 15051827-5340  
OIL CONSERVATION DIVISION 15051827-5400

revenues the State of New Mexico derives from oil and gas production, it is imperative that the impact of each proposed restriction on oil and gas leasing or development be carefully considered and balanced against the value of competing resources prior to the imposition of restrictions. This is particularly important in light of the fact that the Carlsbad Resource Area is a primary source of oil and gas reserves in New Mexico; the loss of valuable potential reserves through surface-use restrictions must therefore be justifiable from a cost/benefit perspective.

37-20

The Department has several concerns with regard to resource development restrictions in selected proposed Special Management Areas (SMAs), i.e., the Los Medanos Raptor Area, the Guadalupe Escarpment Scenic Area, and the Cave Resources Primary Occurrence Zone. The proposed Los Medanos Raptor SMA encompasses 89,360 acres, including 10,240 acres administratively withdrawn by the BLM for the Waste Isolation Pilot Plant (WIPP) Project. In late-1988, truck and/or rail shipments of transuranic and high-level radioactive wastes to the WIPP repository are scheduled to begin; these shipments will continue for a period of up to twenty-five (25) years. The high annual number of shipments, currently estimated at over 1,400 per year (average), will likely cause significant disturbance of raptors in the area. In the light of the preceding scenario, coupled with the fact that none of the identified raptors are threatened or endangered species, the prohibition of seismic/drilling activities within 1/2 mile of active raptor nests for 9 out of 12 months each year is overly restrictive. Drilling is already prohibited within the WIPP withdrawal area; excessive restrictions may not only burden oil and gas producers, but also adversely impact revenues to State and local coffers.

37-21

37-21

See response to comment 27-2.



The "No Surface Occupancy" restriction in the proposed Guadalupe Escarpment Scenic Area SWA also is of concern to the Department. Although oil and gas drilling in the area would impair scenic values, the impact would be temporary and negligible. Moreover, impairment of scenic value could be mitigated to a large degree with appropriate lease stipulations, e.g., accelerated, stringent reclamation requirements and/or no drilling during "tourist" season at the adjacent Carlsbad Caverns National Park. Until accurate, detailed data on the oil and gas potential of the area are compiled, such restrictions are not warranted.

37-22

37-22

Environmental impacts caused by oil and gas exploration and development are significant within areas of high visual sensitivity. The impacts associated with these activities are long term in duration within the desert landscape. Within zone 2 of the SWA, adverse impacts caused by these activities would be partially mitigated through implementation of special stipulations. A seasonal drilling stipulation within zone 2 is impractical due to the extent and scattered distribution of most of the public lands within the zone. See also response to comment 27-6.

Regarding the proposed Cave Resource SWA, the Department recognizes the need to restrict drilling, seismic, and mineral development activities near cave passages. However, it does not appear that the BLM performed any mapping of underground tunnels in any of the identified caves. Such mapping would not only assist cave resource users in their diverse endeavors, but also provide the necessary data to better determine the appropriate extent and severity of drilling and other related mineral development restrictions. In addition, new information may be gained on whether the current restriction on the location of fluid pits (i.e., no pit within 600 feet of a cave passage) is warranted. At the present time, drilling is restricted only within a 300-foot radius of a passage as opposed to the 600-foot radius for fluid pits.

37-23

37-23

Most of the known caves in the Cave Resource SWA have been thoroughly mapped.

We also are concerned about the discussion of the WIPP Project in the draft RFP. The document contains much misinformation on the Project. (See "Specific" comments) For example, there is no mention of the fact that the current withdrawal (Public Land Order 6403) prohibits drilling and mining

37-24

37-24

The minerals withdrawal referred to is a BLM administrative action and that acreage is included in the minerals section (page 2-6, column 2, paragraph 2). The details of the proposed WIPP State Exchange have not been fully negotiated with all affected parties and are, therefore, not discussed in detail. Management of lands surrounding the WIPP site will remain under the multiple-use concept.

on 10,240 acres, including 1,280 acres of State land which is proposed for exchange. This proposed exchange is given only cursory attention in the RMP. The discussion of the WIPP Project also does not include any planning proposals regarding management of Federal lands surrounding the withdrawal area. To ensure that the repository isn't breached by directional drilling from outside the site, BLM must monitor closely existing and proposed drilling activities in those areas adjacent to the Project and coordinate with State regulatory agencies.

37-24

SPECIFIC

p. 1-1 (Table 1-1) -- the acreage shown as withdrawn for the Gnome Site is not consistent with that referenced on p. 2-6 of the text.

37-25

p. 2-5 (Land Withdrawals) -- the fourth paragraph incorrectly states that the existing WIPP Site withdrawal encompasses 640 acres; 640 acres is the size of the U.S. Department of Energy exclusive use area; the current administrative withdrawal includes 8,960 acres of Federal (public) land and 1,280 of State land. Those State lands, however, have not yet passed to Federal ownership.

37-26

p. 2-28 (Table 2-7) -- this table fails to include the 10,240 - acre WIPP Site as an area with a "No Surface Occupancy" stipulation. Compensation to the State by the Federal Government for the loss of revenues due to such mineral development restrictions is a key issue

37-27

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This inconsistency has been corrected in Chapter 1 of the FEIS.

37-26

The 640-acre exclusive use area is that area which is totally under DOE administration. The 8,960-acre withdrawal is essentially an administrative protective withdrawal in which the BLM maintains surface management with the concurrence of the DOE. This is accomplished through a departmental memorandum of understanding (MOU). The statement on page 2-5 is intended to cover only the acreage withdrawn that BLM has no administrative control.

37-27

All but one of the oil and gas leases within the 16 sections proposed for the WIPP project have been purchased by the DOE. None of those existing leases had a "No Surface Occupancy" stipulation on them when they were purchased and new stipulations cannot be added to old leases. The DOE has no intention of allowing any drilling over the 16 sections of the proposed site. The exception is an 80-acre lease which has expired and, under the terms of the administrative withdrawal and MOU, will not be released.



37-27 [ which remains unresolved. It is therefore important that the BLM not misrepresent the current situation by deletion, <sup>and</sup> include a reference to the restriction in the table.

37-28 [ p. 2-29 (Table 2-8) -- the total acreage for those areas closed to leasable solid minerals conflicts with that acreage referenced on p. 2-39 of the text. Such inconsistencies in baseline data do not instill confidence in BLM resource inventory methodologies and results.

37-29 [ p. 3-33 (Withdrawals) -- the discussion regarding existing withdrawals fails to note that pending legislation for the permanent (Congressional) withdrawal of Federal lands for the WIPP Project would transfer jurisdiction over 10,240 acres of land from the Secretary of the Interior to the Secretary of Energy. Also, the fourth sentence is incomplete and requires clarification.

37-30 [ Chapter 4 (Environmental Consequences) -- this chapter is supposed to provide "the scientific and analytic basis for the selection of the preferred alternative." However, nowhere in this chapter is there provided specific, detailed information on estimated quantities of energy and mineral resources that may be lost due to the selection of the preferred alternative. Moreover, potential revenue losses to the State and local communities are neither discussed nor estimated in this chapter or in Appendix G-Economic Data.

37-31 [ State and local communities are neither discussed nor estimated in this chapter or in Appendix G-Economic Data.

37-28 The total acreage closed to leasable solid minerals is 43,976 acres under Alternative C and is consistently displayed both on p. 2-29 (Table 2-8) and on p. 2-39 of the DEIS.

37-29 The fourth sentence under Withdrawal, page 3-3, should read, "An additional 9,600 acres to support WIPP is pending congressional action for withdrawal," and has been changed on page 3-1 of the FEIS.

37-30 and 37-31 The impacts on oil and gas resources has been expanded for each SMA in the FEIS Appendix E.

GOVERNOR  
TONEY ANAYA  
DIRECTOR AND SECRETARY  
TO THE COMMISSION  
HAROLD F. OLSON

State of New Mexico



STATE GAME COMMISSION  
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## DEPARTMENT OF GAME AND FISH

STATE CAPITOL  
SANTA FE  
87003

June 4, 1986

Mr. Charles S. Dahlen  
Bureau of Land Management  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

The comments of the New Mexico Department of Game and Fish regarding the Carlsbad Resource Area Plan do not necessarily represent the official position of the State of New Mexico. Nonetheless, I do appreciate you affording my agency the opportunity to review and comment upon the proposed plan.

My comments regarding the proposed plan (attached) are prefaced by a series of general comments, followed by more specific comments according to subject matter. Once again, thank you very much for the opportunity to review and comment upon the proposed plan.

Sincerely,

*Harold F. Olson*  
Harold F. Olson  
Director

Att. (6 pages)

cc.: John Brown (Dept. of Finance and Administration)  
Leo Griego (Secretary Natural Resources)  
Ron Porter (SE Area Supervisor, NMDGF)



GENERAL COMMENTS

The Carlsbad Resource Area (CRA) encompasses 5,946,886 acres (federal ownership: 37% surface; 46% mineral), including all of Lea and Eddy Counties, as well as the southwest corner of Chaves County. The Resource Management Plan (Plan) focuses on resolving issues of land tenure, mineral and energy resources, rangeland resources, special management areas (SMA's), and access. The Preferred Alternative "C" initiates the first steps in developing a balance between resource utilization and conservation, but does not allow adequate resource allocation to nonconsumptive uses, nor does it stabilize the downward trend in ecological condition of the CRA. The emphasis on resource protection and the preservation of sensitive, natural, cultural, and aesthetic values as found in Alternative "D", also fails to insure stable or improving ecological conditions in the CRA.

37-32

See page 4-28 of the DEIS. A significant improvement in ecological vegetation condition is projected through the implementation of intensive grazing management under Alternative C.

37-33

Mineral withdrawal alternatives ranged from 14,249 acres (Alternative A) to 32,010 acres (Alternative D). The maximum acreage was based on the amount necessary to meet the objectives of Alternative D, and was not arbitrarily selected merely for analysis purposes.

37-33

Higher reclamation standards may be established within the framework of the proposed RMP. No alternative was designed to analyze higher standards than those described in the Draft RMP. Standards could be revised to meet site-specific reclamation needs if they are identified through monitoring studies during plan implementation.

37-34

The section on Continuing Management for soil, water and air (DEIS page 2-8), addresses these issues for the entire resource area.

LAND TENURE

The proposal to increase the disposal base to 220,700 acres is understood as a method to increase management efficiency and to consolidate public land through exchange (Map B delineates the disposal areas for the CRA). Are these zones to be eliminated as management areas, in effect limiting the CRA by more than one-third? Do the properties meet the

37-35

The disposal zones will not be eliminated as management areas but are areas in which the lands generally appear to meet FLPMA disposal criteria. Before a specific tract is sold or exchanged it will be screened for the presence of significant resource values such as T&E species, critical wildlife habitat, cultural sites, etc. (refer to list on DEIS page 2-4).

Federal Land Policy and Management Act disposal criteria? In question are those lands found along the Rio Pecos and similar drainages, the sections of the Pecos River near Carlsbad, and the 25 percent of the surface lands in the San Simon Swale Pronghorn Habitat SMA--all important riparian and wildlife habitats. Without federal ownership in the San Simon Swale, will this site retain its proposed SMA designation?

37-35

The disposal zone in Chaves County will eliminate approximately one-half of the area designated as semiprimitive nonmotorized (Maps B & 3-4). This loss of soil protection, undisturbed wildlife habitat, and recreation opportunity is compounded by the designation of over 99 percent of the CRA as open to motorized vehicles. The application of Alternative "D"--the conservation alternative--will close less than one percent of the CRA to ORV use, and institute a "limited" designation to ORV's on an additional 15 percent (T.2-15). Multiple use implies that a share of management goals will include watershed, wildlife, and recreational values.

37-36

The proposed disposal of the lower Black River (p.4-26) and other sections of intermittent and perennial drainages could be a significant loss to fish and wildlife resources. These lands should take priority as state exchange properties. The Department of Game and Fish should be consulted upon any proposed change in the status of these lands.

37-36

The term Lower Black River was given to this disposal zone because it is just north of the lower end of Black River. A check of the federal lands in that zone shows there is actually no federal land along any intermittent or perennial drainages with the exception of one small parcel along the Pecos River that is in the Pecos River Corridor Complex SMA and would not be subject to disposal.

#### MINERAL AND ENERGY RESOURCES

The summary of impacts found in Table 4-13 for oil and gas exploration and development centers on the added cost and difficulty incurred by the industry through the establishment of the various SMA's. Less than one-half percent of federal minerals is not open to leasing (T.2-15). Other stipulations pertaining to drilling (as described for Alt.D) are no surface occupancy: two percent; seasonal no drilling: five percent; and open with special stipulations: 22 percent; none of which prohibit oil and gas development. I agree that there may be additional costs associated with extraction at some sites, but what of the environmental consequences caused by this activity? Since the 2500 acres approved annually for oil and gas facilities (roads and pads) continue to be surfaced with

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The 2,500-acre figure is an estimated average for analysis purposes and does not indicate a rate of acres disturbed over time. Native vegetation is difficult to reestablish on caliche surfaces. However, rehabilitation is achievable over the long term on most sites. Therefore, these areas are not totally unreclaimable or lost totally to plant production.

Extractive industries are required to post reclamation bonds. BLM has a program to monitor compliance with reclamation standards during the well abandonment process.



37-37

caliche and reclamation of these and the disposal pit acreage is rarely successful (p.4-7), what has been the cumulative impacts of thousands of acres of unreclaimed land? What is the actual amount that has been lost from production through oil and gas development and other mining activities? What is the projected loss in five years, in 50 years? How do these figures compare to the acreage to come under limited protection through the establishment of the SMA's? Why are not higher reclamation standards employed? Do exploration and mining companies post a bond for reclamation? What is the monitoring procedure for affirming adherence to reclamation regulations?

37-38

These questions cannot be accurately answered with today's unstable oil prices. Figures may vary drastically over a 12-month period. Periodic inspections are made until a satisfactory site reclamation is completed.

37-38

37-39

The establishment of seasonal restrictions on oil and gas drilling in three SMA's may provide an adequate buffer for these nesting and fawning areas. The distance of drilling activities from nest sites would be more beneficial if it were set at one-half mile for raptors as is established for the Phantom Banks Heronies SMA. Raptors nest throughout the CRA, and these seasonal buffer stipulations need to be applied to the entire management area, not just to Los Medanos. In addition, the Rocky Arroyo Antelope Herd Unit requires the same stipulations provided to the San Simon Swale Pronghorn Habitat SMA.

37-39 and 37-40

See response to comment 27-2.

37-40

37-41

An HMP (114,500 acres) will be developed on the Rocky Arroyo herd unit and will address all necessary stipulations or restrictions.

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37-42

Which is the correct acreage for no surface occupancy (NSO) for potash? For Alternative "D" Table 2-15 gives 5240 acres, while page 4-36 states, "The acreage under NSO will increase to 102,596." Are the 102,596 acres under NSO stipulations or are they closed to leasable solid minerals as given in Table 2-8? The presentation of figures and the format within which they are discussed need to remain uniform among alternatives as well as throughout the document.

37-42

Alternative "D" on page 4-36 should have read, "The acreage under NSO will increase to 5,240." The figure "102,596 acres" referred to the acreage closed to solid leasable minerals under Alternative U. The error is noted in FEIS Chapter 4, Additions and Corrections to the Draft.

#### RANGELAND RESOURCES

Livestock grazing is the prevalent use of the CRA along with mineral development. The entire federal surface lands are open to grazing except for 6,213 acres (0.29%) closed to all livestock and 25,000 acres (0.92%) closed to sheep and goats (maximum closures as given in Alt.D.T.2-10). On the first page of the Plan it is stated that "The principal consideration for [rangeland resources] is to determine what management changes and/or adjustments in allowable livestock

grazing uses are needed to reduce conflicts with other uses of public lands." None of the alternatives presented in the document adequately considers the other uses of public lands. Intensive management of the CRA for livestock production may develop good forage conditions for domestic livestock, but it will not provide the native vegetation and conditions necessary for wildlife forage and cover. The AUM allocation for wildlife on federal lands west of the Pecos River is one AUM per 232 acres (App.D-12 & D-9), and for livestock it is one AUM per five acres (T.D-6a, current use). These do not include the private and state lands that are also part of grazing allotments, but they do show the relative forage allotment for wildlife (2%). No variable rates of forage allotments between wildlife and cattle were offered in any of the alternatives. On grazing allotments, a minimum of one-third of AUM's need to be available for game and nongame wildlife. This would guarantee increased watershed protection and recreational values in addition to maintaining viable wildlife populations.

37-43

37-43

The RMP/EIS does not allocate forage as a consumptive use. Future determination on forage available for livestock and wildlife will be based on long term monitoring studies and objectives outlined in future Wildlife Habitat Management Plans.

Published research indicates that wildlife habitat can greatly be improved through intensive livestock management. Existing big game AUMs allotted on public lands greatly exceed management objectives for 1990 in the New Mexico Department of Game and Fish Operation Plan.

Information presented on livestock use of the CRA is vague and often contradictory. What is the "current active grazing preference?" It is stated as 216,369 AUM's on page 3-15 and as the total in Table D-6a (p.D-13), and is the basis for comparisons among the alternatives. The discrepancy is that the figures given in Table D-6a do not add up to the given totals. My total for current active preference is 225,460 AUM's. This total is referenced once in the description of Alternative "D" (p.2-44), "In the long term, livestock grazing would decrease from 225,000 AUM's to 191,000 AUM's." The 225,000 AUM level of stocking is the long-term forage target for Alternative "C", which is budgeted \$900,000 to achieve it (T.2-15). Do the 225,460 AUM's represent the authorized level of stocking or does the total include the surplus AUM's utilizing the CRA above authorized and/or carrying capacity levels?

37-44

37-44

Current active preference is 216,369 AUMs. It was assumed that through the implementation of intensive grazing management under Alternative C that the estimated potential carrying capacity would be increased to the 225,458 AUM figure.

The reasoning for the method of apportioning AUM's in Alternative "D" needs to be explained. To achieve an initial stocking capacity of 177,911 AUM's (my total), grazing allotments were reduced in some cases, but 22 allotments were increased beyond the current active preference and higher than the projections in any of the other alternatives (T.D-6a). Four of these allotments (8012, 8112, 8126, & 8141) are to be stocked at twice the current active

37-45

37-45

The estimated initial capacity figures in Alternative D were derived from the 1981-82 rangeland inventory. The five-year average of actual use was the upper ceiling of livestock use to be authorized under Alternative D.



preference (current carrying capacity), and three of these are rated as only fair in ecological vegetation condition (App.D-9). How can initial capacity exceed the potential [carrying] capacity which is supposed to increase over time as ecological conditions improve (a result claimed for intensive livestock management)? Lower potential capacities can only reflect expected degradation to a grazing allotment. How is this an emphasis on habitat preservation and protection (Alt."D")? Since Alternative "D" is to represent a reduction in livestock AUM's, why does the estimated potential capacity equal the five year average of actual use?

37-45

What is the current stocking rates for grazing allotments? Since non-federal acreages were not given in the allotment descriptions (App.D-9), stocking rates could be inferred only for those allotments consisting primarily of federal acres. Allotments 9031 and 9048 have been stocked at approximately one AUM per four acres and are both rated as good in vegetational ecological condition (T.D-6a, Maps A&C). Given the environmental character of southeastern New Mexico, these stocking rates are at least four times too high and indicate that the ecological condition may be too optimistic. Allotment 8121 has had a more realistic rate of stocking at one AUM per 22 acres, but at this rate on gypsum soils (Map 3-1), it is probably too high and the "good" ecological condition class questionable.

37-46

37-46  
The five year average of actual use is 191,515 AUM's. For a discussion of ecological vegetation condition see DEIS Appendix D-5 and page 64-4.

Why are there two different representations of the ecological conditions and which is correct? Table 3-4 displays 41 percent of the acres as rated in good condition and 53 percent rated as fair; while Figure 4-1 indicates approximately 63 and 27 percent rated as good and fair, respectively. How does this affect the comparisons of the expected long-term changes in the vegetation condition for the alternatives?

37-47

37-47  
DEIS Table 3-4 displays ecological vegetation condition by range category for the entire Resource Area. Table 4-1 depicts ecological vegetation condition for that portion of the Resource Area west of the Pecos River.

The protection and enhancement of the riparian, pseudo-riparian, and threatened and endangered (T&E) species habitats as proposed in Alternative "D" is recommended. Additional measures for protection include closing all habitats listed above to ORV use; establishing a buffer of one-half mile or greater around these habitats to eliminate all mineral exploration and development activity to protect them from waste contamination and erosion; and developing livestock water facilities away from stream banks to

37-48

37-48  
A one-half mile buffer around all wildlife SNWAs was not determined to be necessary for the protection and enhancement of the resources.

37-49

eliminate sediment loading and damage to riparian vegetation. The Pecos pupfish (*Cyprinodon pecosensis*), a federal notice of review species, needs to be included in the habitat and resource planning.

#### SPECIAL MANAGEMENT AREAS

The establishment of the proposed SMA's emphasizes allowing for compatible multiple use to occur. Livestock, mineral, and ORV use are included along with wildlife, visual and cultural resource management, watershed, and other resource needs. The converse should also be true. Those lands outside of the SMA's (over 90% of the CRA) need to include similar management criteria. The resources on all of the CRA need to be protected and allocated for multiple use and sustained yield. The Plan discusses how the nonconsumptive uses will affect the management and costs of oil, gas, and mineral production and livestock use of the CRA, but fails to assess the impacts of commodity production on other resource planning and values.

37-50

The Resource Area was analyzed to determine those areas which had special resources or resource conflicts which required specific consideration in the RMP. The remainder of the Resource Area is available for presently unspecified uses. These uses, if proposed, will be analyzed on a site specific analysis based on the broad guidelines contained in the RMP/EIS.

#### ACCESS

I agree that the development of access to those areas of public lands having no legal access is of concern, but what of the extent of access already available? The proliferation of roads due to oil, gas, and mineral development and the 99 percent open status to ORV's should be impetus to close and reclaim access sites rather than pursuing new ones. Large tracts of primitive or semiprimitive nonmotorized status need to be established and maintained within the CRA for nonconsumptive uses. How do the access tract locations displayed on Map 2-3 affect the four WSA's currently under consideration? What is the road density in the CRA? What limitations are there in areas of shallow and friable soils and steep slopes? Why is caliche still retained as the road surfacing agent when it has proven unreclaimable?

37-51

On page 2-17, it is stated that "roads will be closed and rehabilitated where determined to be unnecessary for resource use or access to public land." This action would be taken in areas where there is a proliferation of roads. It is unlikely, due to intermingled land-ownership patterns and present modifications by man, that primitive or semiprimitive nonmotorized opportunities could be increased in the Resource Area. Access tracts would not affect wilderness characteristics within the four wilderness study areas in the Resource Area. Computation of road density would serve no useful purpose in dealing with the access issue since the location of roads is the ultimate factor regarding whether legal access to public lands is or is not available. Engineering standards described in DEIS Appendix F-2 would govern road construction in areas with shallow and fragile soils and steep slopes. Caliche is the only readily available and feasible road surfacing material in most of the Resource Area. This material could be removed and reclamation performed when roads or drilling pads are abandoned.

csp

37-49

The Pecos Pupfish, if found in waters adjacent to BLM-administered lands, will be included in habitat and resource planning.

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38

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Producing Department  
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Midland TX 79702

June 6, 1986

Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
P. O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

On May 7, 1986, Texaco U.S.A. presented oral and written testimony in Carlsbad, New Mexico, at the Bureau of Land Management hearing for the Carlsbad Resource Area Draft Resource Management Plan/Environmental Impact Statement. At the hearing Texaco stated that it would submit further comments prior to the close of the comment period. Attached are Texaco's additional comments, dated June 6, 1986, and Texaco's statement presented at the May 7, 1986 hearing.

Very truly yours,

Alan R. McDaniel  
Division Vice President

By *R. D. Tomberlin*  
R. D. Tomberlin  
Manager - Operations

SAF:cjc

Attachments

ADDITIONAL COMMENTS OF TEXACO U.S.A.  
 JUNE 6, 1986  
 UNITED STATES DEPARTMENT OF THE INTERIOR  
 BUREAU OF LAND MANAGEMENT  
 CARLSBAD RESOURCE AREA  
 DRAFT RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

On May 7, 1986, Texaco U.S.A. presented oral and written testimony in Carlsbad, New Mexico, at the Bureau of Land Management (BLM) hearing for the Carlsbad Resource Area Draft Resource Management Plan/Environmental Impact Statement (CRA Draft RMP/EIS). At the hearing Texaco stated that it would submit additional comments prior to the close of the comment period. This statement is to be considered part of Texaco's comments on the CRA Draft RMP/EIS.

Texaco recommends that Alternative A be adopted in all instances, except in the case of Special Management Areas 10, 11, and 14, where Alternative B should be adopted. In those specific instances where it can be clearly demonstrated that Alternative A does not adequately fulfill the multiple use concept, Texaco recommends the adoption of Alternative B, contingent upon including in the Final RMP/EIS the suggested revisions detailed below.

Nowhere in the Draft RMP/EIS is there adequate justification for departing from the current management plan (Alternative A). There is no assessment of specific deficiencies in Alternative A. Departure from the current management plan should only be made in those specific instances that have been established as being deficient. Even where the Draft mentioned that Alternative A did not comply with various laws, regulations, and policies (e.g., in the last paragraph on page S-5, and in the "Rationale" for Alternative A on pages E-60 and E-62), there were no citations or references identifying the specific provisions or policies for which compliance is lacking. Furthermore, it appears that Draft Alternatives B, C, and D go beyond what is required by current laws and regulations. In fact, it appears that portions of Draft Alternatives B, C, and D contravene the concept of multiple use management mandated by the Federal Land Policy and Management Act of 1976 (FLPMA).

Table 2-15 beginning on page 2-46 of the Draft RMP/EIS summarizes the land use either available or restricted by each Alternative. The large increase in acreage under special stipulations will unduly restrict oil and gas development. The acreage with special stipulations will increase by 236,365 acres (65%), acreage with NSO stipulations by 39,267 acres (828%), and acreage with seasonal drilling stipulations by 91,890 acres (367%), if Alternative C, which was stated in the Draft as being the Alternative the BLM preferred, is adopted. There are additional general restrictions which would adversely impact the oil industry. Alternative C prohibits locating production facilities in 100-year floodplains (7300 acres), and requires netting on all

Each Special Management Area was reanalyzed to ensure that existing stipulations (Alternative A) could not adequately protect the environmental resources present. Some SMAs were changed (see FELS Chapter 2). A more detailed discussion of each SMA is available for review in the Carlsbad Resource Area. Also, FELS Appendix E includes an impact analysis by SMA on oil and gas development.

Regarding your specific comment concerning cultural resources, BLM is complying with the policy or standard practice to require site mitigation on direct impact areas only. However, recent studies conducted onsite in the Carlsbad Resource Area have indicated that this approach does not adequately mitigate impacts to these cultural properties and, consequently, is not in compliance with 36 CFR 800.



salt water disposal pits and tanks. In certain cases it may not be possible or practical to locate production facilities outside of the floodplain. These restrictions should continue to be reviewed on a case-by-case basis (Alternative A).

It is clear that the restrictions and stipulations imposed by Alternatives B, C, & D in the Draft RMP/EIS will seriously impact the oil and gas industry now and for years to come. Some of the probable consequences will be loss of leases, increases in operating and drilling costs, lost reserves, loss of jobs, reduced revenues for companies, and reduced royalties for the State and Federal Governments and individual citizens.

Alternatives B, C, and D, in the current Draft RMP/EIS, are unjustifiably critical of the impact oil and gas activities will have on other resources. It has been demonstrated, time and again, that development of oil and gas resources is compatible with the protection and development of other natural resources. Texaco recommends the revisions below be adopted as part of the Final RMP/EIS. Other changes will be required throughout the RMP/EIS so as to be fully consistent with the revisions made to the text of Appendix E. We believe these modifications will result in an equitable Resource Management Plan under which all natural resources are protected, managed, and developed for multiple use pursuant to FLPMA.

The following "objectives, prescription, and rationale" are recommended for the Special Management Areas (SMA's) in Appendix E:

**SMA NO. 1** - This 540-acre area has previously been designated as a Federal Critical Habitat for the Federally Threatened Gypsum Wild Buckwheat Plant. Alternatives C & D encourage the expansion of the SMA.

**\*\* Basis For Recommended Revisions \*\***

There are already two abandoned wells within the SMA. The damage to the habitat has been minimal to non-existent. Normal well spacing requirements range from one well per 40 acres up to one well per 640 acres. A location and road will require a surface distance of only +4 acres. Any road would likely service multiple locations. Further expansion of the habitat can be pursued without the need to prohibit oil and gas activities. The area adjoining the SMA should remain available for multiple use.

Recommended Revisions:

ALTERNATIVES C & D

Any location within the 540 acres would destroy critical habitat and existing buckwheat plants. Any proposed disturbance within this area would require section 7 consultation with the U.S. Fish and Wildlife Service.

Same as Alternative B.

SMA NO. 2 (a-f) - This cave SMA is being established to provide for intensive management of the cave resources within the Carlsbad Resource Area.

**\*\* Basis For Recommended Revisions \*\***

Both the oil and gas and cave resources are important resources. Cave resources have been adequately protected without unnecessarily prohibiting oil and gas activities to date. This has been demonstrated as there have not been any incidents of damage to caves (due to drilling) noted in the Resource Management Plan/Environmental Impact Statement. Also, the minimal "surface" disturbance associated with drilling will not in any way adversely impact the "subsurface" cave resource. Oil and gas resources and cave resources can be developed simultaneously as past history has shown. The SMA, as drafted, does not sufficiently justify the restrictions associated with oil and gas activities.

**Recommended Revisions:**

**ALTERNATIVE B**

**38-3**

38-3

See response to comment 25-1.

Objective: To continue intensive management of the CRA important cave resources while enhancing scientific research, environmental education, intensive recreation use, and allow for continued development of oil and gas resources.

Prescriptions: Establish eight ... as Honest Injun Cultural Resource Management Area (CRMA). Maintain protective cave stipulations for oil and gas development - no drilling within 300 feet of a cave passage, no earthen pits within 600 feet of a cave passage.

Rationale: Caves receiving recreational use require intensive management to minimize conflict with other resource uses and to improve upon recreation activity opportunities.

**ALTERNATIVE C**

Objective: Same as Alternative B

Prescriptions: Same as Alternative B with the addition of the following. Designate the Chosa Draw Cave Complex (720 acres) as an ACEC. The Little Manhole/Big Manhole and Mudgetts/Little Mudgetts cave management units would also be in the proposed



Dark Canyon ACEC (see SMA No. 4). Increase protective cave stipulations for oil and gas development - no drilling within 450 feet of a cave passage, no earthen pits within 600 feet of a cave passage.

**Rationale:** Caves receiving frequent use require increased management to provide recreation activity opportunities.

#### ALTERNATIVE D

**Objective:** Provide maximum protection for cave resources.

**Prescriptions:** Same as Alternative C, but added measures to increase protection of cave resources. Designate 1200 acres of the McKittrick Hill Caves Complex as McKittrick Hill Caves National Natural Landmark. The SMA would be closed to solid leasable minerals and mineral sales. Grazing in the Chosa Draw area would be reduced to 25 percent maximum utilization. Oil and gas drilling and earthen pits would not be permitted within 600 feet of a cave passage.

**Rationale:** Same as Alternative C, but added protective measures would maximize protection of cave resources and still permit development of important oil and gas resources. Restricted grazing at Chosa Draw Caves Complex would lessen contamination of the sensitive hydrologic ecosystem associated with these gypsum caves.

**NOTE:** Table of prescriptions on page E-6 should be changed to reflect the following for Alternatives B, C, and D:

- 0 acres - No surface occupancy - oil and gas
- 0 acres - Close to seismic activities
- 595 acres - Rights-of-way avoidance areas.

**SMA NO. 3** - This is a 1960-acre area identified by the New Mexico Natural History Institute. It is an excellent example of essentially undisturbed Chihuahuan Desert ecosystem. Also, potential habitat exists for five state endangered plant species. There have been no wells drilled within this proposed SMA. Future oil and gas potential would be "exploratory".

**\*\* Basis For Recommended Revisions \*\***

38-4

To maintain the integrity of this ecosystem, drilling would be allowed on the mesa and hills outside the canyon but not in the canyon or on its slopes. The Bureau is also legally responsible for protection of State listed Endangered Species (Endangered Species Act Amended 1982).

The recommended changes will adequately protect the ecosystem. There has not been any drilling, thus far, in the proposed SMA. Future oil and gas activity will likely continue to be very light, and any activities would only be a minimal surface disturbance. Existing FLPMA guidelines intend area with multiple resource potential should be maintained for multiple use. Although there has been mineral exploration in this immediate area, restrictive stipulations for oil and gas activities should not be included. It should also be noted none of the "State" endangered plant species are "Federal" endangered species as per the Department of the Interior Endangered Species of Arizona and New Mexico, 1984. Existing State conservation recommendations do not propose restrictions as stringent as those proposed by BLM.

Recommended Revision:

#### ALTERNATIVE C

Objective: [No change from Draft RMP/EIS.]

Prescriptions: Designate 1360 acres as an RNA. Disallow livestock, mineral production, and recreational ORV use within the canyon. Steep topography and existing fencelines would be used with some additional fencing.

Rationale: This provides an adequate management plan to safeguard the ecosystem and develop critical resources. This is an excellent representative sample of the Chihuahuan Desert ecosystem. Therefore, it should be preserved for research purposes.

#### ALTERNATIVE D

Same as Alternative C.

NOTE: Table of prescriptions on page E-14 should be changed to reflect the following for Alternatives C and D:

- 0 acres - No surface occupancy - oil and gas
- 0 acres - Close to seismic activities
- 0 acres - Right-of-way avoidance area.

SMA NO. 4 - This 4750-acre area contains two cave systems (Mudgetts/Little Mudgetts and Little Manhole/Big Manhole) previously addressed in SMA No. 2. The Dark Canyon area also has "high visual qualities". Two state proposed endangered plant species occur in this area.

38-5

The NSO stipulation would apply to management in zone 1 of this SMA in Alternatives C and D, which is delineated primarily because of high scenic and sensitive visual values associated with the Serpentine Bends and Fawn Valley areas of Dark Canyon. Wilderness as an issue is not addressed in this planning document (see response to comment 24-5). The relatively scarce and high scenic values associated with the natural landscape in zone 1 of the SMA and the caves within the area makes it qualify for consideration as a designated AGCC. Refer also to responses to comments 20-5 and 27-6.



\*\* Basis For Recommended Revisions \*\*

Cave areas within the SMA are adequately protected in SMA No. 2 (Cave Resources). Any additional NSO restrictions are not justifiable. Furthermore, it is premature to propose extremely restrictive stipulations to protect a "visual" resource that may never qualify as a Scenic Wilderness Area. If it does fail to qualify, this area should then be open for all resource development as dictated by the FLPMA. The existence of oil and gas wells will not prevent viewing the scenic area. Litigation for offshore wells within view of the California coast has already resolved this issue.

It should be noted that two "State" proposed endangered plant species are not "Federal" endangered species. The restrictions proposed by BLM are more stringent than those required by the State.

In summary, it is felt withdrawal of Dark Canyon as a Special Management Area should be considered. There is insufficient justification to designate this area as a SMA in the event it fails to qualify as a Wilderness Area.

Recommended Revisions:

ALTERNATIVE B

Objective: Same as Alternative A.

Prescriptions: Provide limited fire supersession, acquire public access, and designate limited recreational ORV use (designated routes).

Rationale: The management prescription provides for maximizing multiple-use. Current case-by-case project evaluation under the Interim Management Policy offers adequate protection until such time the Wilderness Review is completed.

ALTERNATIVES C AND D

Same as Alternative B.

NOTE: Table of prescriptions on page E-18 for Alternatives B, C, and D should be the same as those shown for Alternative A.

SMA NO. 5 - This 2990-acre area is being reviewed for its suitability as a Wilderness Area. It contains cave and scenic resources in addition to geologic and wildlife values and rare plant species. Currently there is a NSO stipulation on 1200 acres and special stipulations on 147 acres.

38-6

See response to comment 25-2.

38-5

38-6

**\*\* Basis For Recommended Revisions \*\***

The reasons are similar to all those discussed in SMA Nos. 4 and 20. There is one exception to SMA No. 4. Lonesome Ridge (SMA No. 5) does contain one Federal threatened plant (McKittrick Penroyal). However, this plant occurs on moist canyon walls within Big Canyon and would not be affected by oil and gas activities.

There has not been any oil and gas exploration to date within the proposed SMA and future oil and gas activity is likely to be minimal. Existing restrictions are adequate. Oil and gas exploration will not significantly impact cave and/or scenic resources.

**Recommended Revisions:**

**ALTERNATIVE B**

**Objective:** Continue protection of outstanding natural values as in Alternative A, and improve access.

**Prescriptions:** Acquire access to Golden Staircase Trail and Big Canyon.

**Rationale:** Same as Alternative A.

**ALTERNATIVES C AND D**

Same as Alternative B.

**Note:** Table of prescriptions for Alternatives B, C and D on page E-21 should be the same as those for Alternative A.

**SMA NO. 6 (a-f)** - Six springs (524 acres) are included in this 1166-acre SMA. The acreage includes "buffer" acreage and 200 acres of riparian habitat, and additional acres for T&E species habitat. The Federally listed threatened fish plant (Pecos gambusia) is found in Blue Springs and the threatened plant (Gypsum Wild Buckwheat) is found in a number of the spring areas.

**\*\* Basis For Recommended Revisions \*\***

The proposed changes will provide adequate protection for the T&E habitats. The drafted prescriptions represent excessive measures for protection that would prevent the development of important oil and gas resources. Oil and gas activities have co-existed in the SMA without detrimental

38-7

The Endangered Species Act, Floodplain Management Executive Order No. 11988, and Protection of Wetlands Executive Order No. 11990 outline all Federal agencies' responsibilities for protecting these resources. Most of the spring areas are small, narrow bands and modern drilling techniques would be used to extract oil and gas reserves beneath the springs.

38-7

38-6



effects to the habitats. The area has excellent potential and the draft restrictions would restrict development in at least two spring areas.

Recommended Revisions:

ALTERNATIVE B

Objective: [No change from Draft RMP/EIS.]

Prescriptions: Manage six springs (524 total acres) to adequately protect the Springs Riparian Habitat. One T&E Critical Habitat would be designated. Future surface disturbances within 300 feet of all springs would be prohibited. No drilling for oil and gas or earthen pits within 300 feet of any spring would be permitted. Prescriptions also include withdrawal of locatable minerals, closure to mineral material sales, livestock exclusion, recreational ORV closure or limitation, and limited fire suppression.

Rationale: Protection of the water and the riparian vegetation is crucial in maintaining threatened species wildlife habitats. The proposed prescriptions would provide adequate protection, yet still allow development of important oil and gas resources.

ALTERNATIVE C

Objective: [No change from Draft RMP/EIS.]

Prescriptions: Same as for Alternative B, but no oil and gas drilling or earthen pits would be located within 450 feet of Blue Spring.

Rationale: Same as Alternative B, but increased protection of the Blue Spring habitat for the Pecos gambusia.

ALTERNATIVE D

Same as Alternative C.

NOTE: Table of prescriptions on page E-24 should be changed to reflect the following for Alternatives B, C, and D:

- 0 acres - No surface occupancy - oil and gas
- 0 acres - Close to seismic activities
- 0 acres - Rights-of-way avoidance area.

**SMA NO. 7** - This 5460-acre area is intended to protect fragile gypsum soils and the proposed State Endangered Gypsum Milkvetch which occurs throughout the area. It is also a suitable habitat for Gypsum Wild Buck and the barking frog; the area has not yet been inventoried.

**\*\* Basis For Recommended Revisions \*\***

The only known proposed endangered species is not a Federal endangered species. The barking frog is a New Mexico group 2 endangered species. New Mexico "Conservation" practices do not require NSO stipulations to protect the habitat. Therefore, Federal restrictions should not be more stringent than those of the State. Fragile gypsum soil in itself does not justify designating this area as a Special Management Area. Appropriate management plans should not be proposed on the "possibility" some endangered species exist. The intent of the FLPMA was not to protect the habitat without occurrence of the T&E species. The area should remain open to oil and gas activity in all the alternatives.

**Recommended Revisions:**

**ALTERNATIVES B, C, AND D**

Same as Alternative A.

**NOTE:** Table of prescriptions on page E-37 should be changed to reflect the following for Alternatives B, C, and D:

- 0 acres - No surface occupancy - oil and gas
- 0 acres - Rights-of-way avoidance area.

**38-8**

38-8

See response to comments 20-1 and 38-4.

**SMA NO. 8** - This area totals 200 acres. The area is designated for protection because it is associated riparian habitat for the Bluntnose Shiner, a "proposed" Federal endangered species. All oil and activity would be prohibited on this SMA.

**\*\* Basis For Recommended Revisions \*\***

The current restrictions will provide adequate protection for Bluntnose Shiner. All proposed restrictions should be removed until this fish species qualifies for the Federal T&E list. NSO stipulations for oil and gas are excessive and unnecessary restrictions.

**Recommended Revisions:**

**ALTERNATIVE B**

Protection of Critical Habitat is the Bureau's responsibility on public lands. The protection of habitat for both Federal and State listed species is mandated in the Endangered Species Act amended 1982. Enhancement of the full 200 acres adjacent to the Pecos River is important since this portion of the River is included as Critical Habitat for the Bluntnose shiner.

38-9

**38-9**



Objective: [No change from Draft RMP/EIS.]

Prescriptions: Close the entire area to removal of locatable and saleable minerals. No recreational ORV use will be permitted. Prohibit oil and gas drilling within 300 feet of the edge of the Pecos River.

Rationale: [No change from Draft RMP/EIS.]

ALTERNATIVES C AND D

Same as Alternative B.

NOTE: Table of prescriptions on page E-40 should be changed to reflect the following for Alternatives B, C, and D:

0 acres - No surface occupancy - oil and gas  
0 acres - Rights-of-way avoidance area.

SMA NO. 9 - This 500 acre is a habitat for the New Mexico Endangered Ramshorn Snail, which is also a candidate for Federal T&E status. It is a Group I species - "species whose prospects of survival or requirement within the state are in jeopardy".

\*\* Basis For Recommended Revisions \*\*

Oil and gas activities requiring minimal surface disturbance can be reviewed by BLM and/or the State on a case-by-case basis in Alternative A. The SMA expansion in Alternative C and D provides the same protection in the "buffer zone" as in the habitat. A buffer zone, if even necessary, should not require the same prescriptions. The proposed changes provides for multiple use as per the FLPMA. The draft prescriptions are unnecessarily stringent.

Recommended Revisions:

ALTERNATIVE B

Objective: [No change from Draft RMP/EIS.]

Prescriptions: Designate the entire 100-acre area as an RNA. The 100-acre RNA will be closed to mineral material sales, ORV use, and livestock use.

Rationale: [No change from Draft RMP/EIS.]

ALTERNATIVES C AND D

See response to comment 38-9. The 100-acre RNA will enhance valuable research upon which to base future management decisions as to the level of restrictions necessary to protect the critical habitat.

38-10

Same as Alternative B.

NOTE: Table of prescriptions on page E-43 should be changed to reflect the following Alternatives B, C, and D:

- 0 acres - Restricted surface disturbance
- 0 acres - Close to seismic activities
- 0 acres - Rights-of-way avoidance area.

38-11

SMA NO. 10 - The Laguna Plata Archeological District contains 3360 acres. The numerous archeological sites resulted in declaring the area "eligible" for listing in the National Register of Historic Places.

\*\* Basis For Recommended Revisions \*\*

It is premature to designate this area as a SMA at this time. It is possible the area may not be listed in the National Register of Historic Places. If this becomes the case, all existing restrictions should be modified to permit multiple use as dictated by the FLPMA. The RMP can be amended when the listing is either approved or rejected.

The existing draft prescriptions would establish excessive restrictions if the land is returned for multiple use.

Recommended Revisions:

It is recommended the SMA be removed from the draft RMP and the table on page E-46 be eliminated.

38-12

SMA NO. 11 - This SMA is eligible for the National Register as an Archeological District. Known camp sites date back to as early as 5000 BC. A total of 8263 acres still remain to be surveyed before the final District boundaries and the National Register nomination would be complete.

\*\* Basis For Recommended Revisions \*\*

Potentially 12,423 acres would be severely restricted from multiple use, while only a suspected limited number (number of sites not stated by BLM) of sites are present. The proposed prescriptions would provide adequate protection for cultural sites and permit other resource development as designated by the FLPMA.

Recommended Revisions:

38-11

Special Management Areas are, by definition, areas which require special attention because of the presence of sensitive resources or because of resource conflicts in a given area which need special attention. Until the Laguna Plata nomination is decided on, the BLM is legally required to manage the proposed district to prevent the compromise of the resource values under consideration for the National Register.

38-12

See response to comment 38-11.



It is recommended this SMA be removed and the table on page E-48 be eliminated from the RMP for the same reasons stated in the discussion for SMA No. 10. The following changes are proposed in the event this is not done.

#### ALTERNATIVE B

Objective: [No change from Draft RMP/EIS.]

Prescriptions: Complete the survey of 8263 acres as required by the East Eddy-Lea MFP. Nominate only the acreage containing the specific sites for the National Register Archeological District enabling maximum multiple use. Remove NSO stipulations for oil and gas. Restricted surface disturbance of only known surveyed sites would be prohibited.

Rationale: Only the specific sites need to be preserved. Prudent management can permit multiple use in areas where no cultural site(s) exist.

#### ALTERNATIVE C

Objective: Same as Alternative A.

Prescriptions: Same as for Alternative B, but BLM would arrange for excavation and sampling of specific impacted sites within a reasonable time, prior to oil and gas development.

Rationale: Same as Alternative B.

#### ALTERNATIVE D

Same as Alternative C.

NOTE: Table of prescriptions on page E-48 should be changed to reflect the following for Alternatives B, C, and D:

- 0 acres - No surface occupancy - oil and gas
- 0 acres - Close to seismic
- 0 acres - Rights-of-way avoidance area.

SMA NO. 12 - This is only a four acre site. Two wooden wheels and a wooden shaft from an oil well drilled in 1925 remain at the site. The well was dry. However, it is credited for discovering potash. The site is eligible for the National Register of Historic Places.

38-13

Your point on interpretive signs and a highway marker are well taken. These actions are proposed as part of the alternative actions for the proposed SMA. Preservation of historic structures within their original setting is usually preferable as it has more "atmosphere" in its original setting.

**\*\* Basis For Recommended Revisions \*\***

The artifacts will be preserved better in a museum. The site itself does not require protection in order to denote the significance of the potash discovery.

**Recommended Revisions:**

It is recommended this Special Management Area (SMA) and its accompanying table on page E-50 be removed from the RMP. It would be better to preserve the artifacts in an appropriate location, such as a museum, and to place a historical marker on a highway nearest the site. The following alternatives are proposed in the event this is not done.

**ALTERNATIVE B**

**Objective:** [No change from Draft RMP/EIS.]

**Prescriptions:** Install a historical marker (or interpretive sign) at the nearest crossroad to the site. Remove the historical artifacts and offer them to an appropriate museum for preservation. Remove all existing restrictions and return the land for multiple use.

**Rationale:** The specific site does not require preservation. More of the public would be made aware of the area's historical significance with a readily visible crossroad marker.

**ALTERNATIVES C AND D**

Same as Alternative B.

**NOTE:** Table of prescriptions on page E-50 should be changed to reflect the following for Alternatives B, C, and D:

- 0 acres - No surface occupancy - oil and gas
- 0 acres - Rights-of-way avoidance area.

**SMA NO. 13** - This is the largest SMA at 89,360 acres, (4% of the Carlsbad Resource Area). There have been 92 wells drilled within this SMA, of which 139 wells are still producing. Annual production from this area in 1984 totalled 67,222 barrels of oil and 5.73 BCF of gas.



This SMA is intended to provide protection of the habitat of breeding raptors. Stringent seasonal stipulations are proposed for drilling activities.

**\*\* Basis For Recommended Revisions \*\***

Presently there are no known Federally T&E raptor species found in the proposed SMA. The draft restrictions and stipulations are unnecessarily stringent. There is currently an average of only one producing well per 2291 acres. Each well site is approximately 2 acres in size; or a total of 78 acres out of 89,360 acres has been disturbed. Furthermore, there has never been more than eleven wells spudded in any given year. This equates to only 1382 acres (11 X 1/4 mile radius per well) being disturbed in any given year. This minimal amount of activity does not justify the harsh stipulations for the area. We feel the 1/4 mile radius is significantly larger than required. It is also noted oil and gas activity has been present within the SMA since 1928. The existing high density of raptors demonstrates oil and gas activity has not significantly harmed the raptor habitat. We can only conclude, our industry has developed the resources in harmony with nature.

Restrictions prohibiting the removal of trees in excess of three meters would also seriously impact development of oil and gas resources. This restriction would require locations be moved, which could lead to higher drilling costs and/or dry holes.

The draft drilling stipulation permits drilling during a three month time slot only. Most of the potential within this SMA is deep gas. It is impossible to prepare a location, drill, and complete a well in three months. Usually four or more months are required, assuming there are no drilling problems, to complete a typical deep (Atoka or Morrow) gas well. This restriction will effectively prevent drilling.

Texaco's acreage in this SMA is approximately 14800 acres. We would not be able to develop our resources on this land with the proposed SMA restrictions.

The 4-1/2 townships within this SMA has some of the best development potential for the deep Pennsylvanian (Penn) strata in the Delaware Basin. A total of 137 townships in both Lea and Eddy counties have known Penn potential in the Delaware Basin. The entire SMA, 4-1/2 townships, is within this area of known potential. Future Penn development in 12% of the Delaware Basin in New Mexico would be seriously impacted by this SMA. The RMP/EIS drastically understated the

impact the draft alternatives would have on oil and gas development. It has the potential to virtually stop future development.

Recommended Revisions:

ALTERNATIVE B

Objective: [No change from Draft RMP/EIS.]

Prescriptions: Restrict seismic and drilling activities within 400 feet of any raptor on the Federal T&E species list from April 1 to July 31.

Rationale: Restrictions are a sensible management plan to protect T&E raptor species while allowing maximum production of other valuable resources.

ALTERNATIVES C AND D

Same as Alternative B.

NOTE: All the prescriptions in the table on page E-50 for Alternatives B, C, and D should be the same as those for Alternative A.

SMA NO. 14 - This 25,000-acre area SMA is for the protection of the San Simon Swale Pronghorn. One State endangered plant (sand gune unicorn) occurs within this area.

\*\* Basis For Recommended Revisions \*\*

The pronghorn is neither a State nor Federal T&E species. Protective stipulations and/or restrictions are not justifiable. The area should be managed to provide maximum multiple use pursuant to FLPMA.

Recommended Revisions:

ALTERNATIVES C AND D

Same as Alternative B.

NOTE: Table of prescriptions on page E-55 should be changed to reflect the following for Alternatives B, C, and D:

0 acres - Seasonal stipulation on drilling activities.

38-15

The proposed plan has dropped SMA No. 14 from Special Management status.



SMA NO. 15 - This is another large 26,800-acre area with stipulations and restrictions adversely impacting other resources. The SMA is for the protection of great blue heron. This bird is not a State or Federal T&E species.

**\*\* Basis For Recommended Revisions \*\***

The SMA was principally proposed for the protection of the great blue heron. This bird is not on the State or Federal T&E species list. Therefore, its protection does not justify the stipulations and restrictions that will adversely effect other resources in the area.

**Recommended Revisions:**

It is recommended this SMA be removed from the draft. The following Alternatives are proposed if this is not done.

**ALTERNATIVE B**

Same as Alternative A.

**ALTERNATIVE C**

**Objective:** To advance protection for great blue heronries under existing multiple use management.

**Prescriptions:** Implement seasonal stipulations restricting oil and gas drilling and seismic from April 1st to July 30th within 1/8 mile of a known heronry.

**Rationale:** Restrictions and stipulations are a sensible management plan to cover the 26,800 acres. This will protect heronries while allowing use of other resources.

**ALTERNATIVE D**

Same as Alternative C.

**NOTE:** Table of prescriptions on page E-58 should be changed to reflect the following for Alternatives B, C, and D:

	B	C	D
Seasonal stipulation on drilling	0	26,800	26,800
Seasonal closure to seismic	0	26,800	26,800

SMA NO. 16 - This 51-acre area has been declared eligible for nomination to the National Register of Historic places by the State Historic Preservation Officer (SHPO) in 1984.

38-16

See response to comment 27-2.

38-17

Excavation will begin as soon as funding becomes available to the CRM program.

All the proposed Alternatives comprise a rational plan for providing development of multiple resources. Restrictions on oil and gas development are appropriate. We request the BLM begin excavating the site(s) at the earliest date possible.

No revisions are recommended for this SMA.

SMA NO. 17 - Several archeological sites are found within this 3040-acre area, of which only one site has been determined eligible for the National Register of Historic Places by the State Historic Preservation Officer (SHPO).

**\*\* Basis For Recommended Revisions \*\***

Large "buffer" areas without known cultural sites fail to justify restricting development of other resources. Protecting only the specific site is necessary. Managing a larger area for the protection of a few sites is not in the best interest of BLM or industry. The proposed alternatives should provide adequate preservation of the cultural resources.

Data provided in the RMP/EIS was insufficient (location and/or specific size was not included) for proper evaluation of the adverse impact the restrictions and stipulations would have on other resources. This is also true for SMA Nos. 11, 12, 16, 17, 18, and 19. The data is apparently public information, yet it was withheld from being included in the draft in order to protect the sites. The cultural resource SMA's total 32,188 acres, +2.8% of the CRA. It is difficult to impossible for industry to access the impact when the EIS lacks crucial data.

Recommended Revisions:

**ALTERNATIVE B**

Objective: Same as Alternative A.

Prescriptions: Protect only those cultural sites that are eligible for the National Register. Protection would cease if the sites are not selected, or after they excavated and/or sampled. The "specific" sites will be identified and surveyed. Development of other resources will not be restricted outside the surveyed site.

Rationale: [No change from Draft RMP/EIS.]

ALTERNATIVES C AND D

Bear Grass Draw SMA was identified because several known sites within the proposed boundary present similar management problems as the one site within the boundary already determined eligible for National Register nomination. The proposed boundaries do not represent a "buffer area" but rather they denote an area with special management problems. The regulation 36 CFR Part 1215.20 prohibits public disclosure of the nature and location of cultural resource sites except in very restricted circumstances. Leases affected by this SMA have been listed with corresponding acreage and is available for review in the Carlsbad Resource Area. Any lease holder who is concerned with the possible impacts to their operation may contact the BLM and the impacts can be evaluated without public disclosure of sensitive site information. Again as noted in 38-17, excavation plans will be implemented when the funding becomes available.



Same as Alternative B.

NOTE: We request the BLM begin excavating the site(s) at the earliest date possible. The prescriptions in the table on page E-63 for Alternatives C and D should be the same as those for Alternative B.

SMA NO. 18 - This 5190-acre area includes two canyons which converge with the Pecos River. They contain unique riparian habitat, soil type, scenic values, complex archeological sites, and prime wildlife habitat for twenty-two endangered animal species.

**\*\* Basis For Recommended Revisions \*\***

The qualities and unique natural and cultural resources will not be significantly impacted by oil and gas activities. This area is not a Wilderness Area, therefore, the prescriptions should not protect "scenic qualities" at the expense of other resources. This contradicts the FLPMA.

The numerous T&E species should be protected. Existing practice requires an archeological report be done before App's can be approved. Locations are moved as required. This procedure adequately protects cultural sites and/or T&E species within the disturbed area. The BLM NSO stipulations are an excessive protection measure. Existing State conservation practices for T&E species are less stringent than those in the Draft RMP/EIS.

**Recommended Revisions:**

**ALTERNATIVE B**

**Objective:** [No change from Draft RMP/EIS.]

**Prescriptions:** Establish a 1520-acres RNA. Withdraw from locatable minerals, close to solid leasable minerals, and mineral material sales. Maintain the 1215-acre ORV closure (exempt seismic) and limit recreational ORV use to designated routes on the remaining 3175 acres. Exclude livestock within the proposed RNA. Limited fire suppression would be applied.

**Rationale:** Two large distinctive limestone and sandstone canyons (Pierce and Cedar) coverage with a free-flowing section of the Pecos River to provide a unique landscape in southeastern New Mexico. Important sensitive resource value includes

38-19

See response to comment 27-5. See response to comment 38-11 for discussion of SWA's and cultural resources. The legal guidelines stated in response to comment 38-7 also apply to this SWA.

fragile and varied soils, prime habitat for several New Mexico Endangered animal and plant species, high scenic qualities associated with Pierce and Cedar canyons, and large and complex cultural associations.

#### ALTERNATIVE C

**Objective:** [No change from Draft RMP/EIS.]

**Prescriptions:** Establish a 4390-acre ACEC with the same restrictions as those for the RNA in Alternative B.

**Rationale:** Same as Alternative B, except the ACEC designation and additional area to be protected will maximize protection of all natural and cultural resources while permitting development of important oil and gas resources.

#### ALTERNATIVE D

Same as Alternative C.

**NOTE:** The prescriptions for Alternatives C and D in the table on page E-65 should be the same as those for Alternative B, with the exceptions of the establishment of an ACEC of 4390 acres. The prescriptions for Alternative B should be changed to the following:

1520 acres - Restricted surface disturbance  
0 acres - No surface occupancy - oil and gas  
0 acres - Rights-of-way avoidance area.

**SMA NO. 19** - This is a 40 acre National Register Historic site. NSO restrictions Currently apply to the area.

No revisions are recommended for this SMA.

**SMA NO. 20** - This large 49,470-acre SMA is for the protection of scenic resources. It is divided into two zones for plan purposes. The first zone, 8880 acres, contains the most stringent restrictions. The remaining acreage is the second zone. The scenic resources consist of the Guadalupe Escarpment near the Carlsbad Caverns National Park. There is some oil and gas activity within the SMA, mainly gas wells.

\*\* Basis For Recommended Revisions \*\*

38-20

The high level of visual sensitivity of the SMA's characteristic landscape establishes the need for management as an SMA. Regarding wilderness, see response to comment 20-5 and 24-5. Under Alternative C and D, most of the SMA would be available for oil and gas exploration and development; under Alternative B, all but 120 acres would be open (see Appendix E, page E-71 of draft RMP/EIS document).



Oil and gas activities will not prevent viewing the scenic area, nor will it significantly impact the scenic resource. The area is not part of an approved wilderness area, and should therefore, be managed for multiple use. The stringent restrictions and stipulations prevent development of other important resources. The draft SMA prescriptions do not follow the FLPMA.

Texaco has an interest in ±2500 acres within this SMA. The draft drilling restrictions will prevent us from developing our oil and gas resources.

Recommended Revisions:

ALTERNATIVE B

Objective: [No change from Draft RMP/EIS.]

Prescriptions: Establish an 8820-acre scenic area, limit recreational ORV use to designated routes, apply limited fire suppression techniques, and review surface disturbing activities on a case-by-case basis as in Alternative A. Manage the area in accordance with FLPMA.

Rationale: Visual intrusions in the area are minimal. Oil and gas activities are already present. Oil and gas resources can be developed with insignificant impact to the visual resource.

ALTERNATIVE C

Objective: [No change from Draft RMP/EIS.]

Prescriptions: Increase scenic area acreage to 49,570 acres. Other prescriptions will be the same as Alternative B.

Rationale: Same as Alternative B.

ALTERNATIVE D

Same as Alternative C.

NOTE: The prescriptions in the table on page E-71 for Alternatives C and D will be the same as for Alternative B, except that the scenic acreage will be 49,570 acres. Prescriptions for Alternative B should be changed to the following:

0 acres - Restricted surface disturbance.  
 0 acres - No surface occupancy - oil and gas  
 0 acres - Special stipulations - oil and gas  
 0 acres - Limit "recreational" ORV use - designated routes.

SMA NO. 21 - This is a 900-acre area adjacent to the City of Carlsbad motocross track. The area is used for casual motorcycle use. It also has numerous active oil and gas wells located within the SMA.

**\*\* Basis For Recommended Revisions \*\***

Special stipulations as per the draft RMP could possibly lead to additional drilling costs. Furthermore, drilling locations are selected to maximize recoveries. Moving a location to preserve an ORV trail or use area could result in drilling an unsuccessful well (dry hole). Oil and gas activities must take precedence over recreation ORV use.

**Recommended Revisions:**

ALTERNATIVES B AND C

Same as Alternative A.

**ALTERNATIVE D**

Objective: To manage 900 acres for minimizing ORV use conflicts with other important resources.

Prescriptions: Highlight recreational ORV permits to ensure that all activities are compatible with oil and gas development. Authorize ORV events within area. Continue full fire suppression.

Rationale: No motorcycle events have been authorized within the area; however, it receives very heavy random use and interest has been expressed for events in the area by the local motorcycle club. Working closely with the oil and gas industry can result in continued and expanded ORV use while still providing for minerals and other resource development.

NOTE: Table of prescriptions on page E-74 should eliminate "special stipulations" for oil and gas activities for all alternatives.

Relocating a proposed drilling pad would be the exception for mitigating ORV use within the area. The partial relocation of a road or pipeline right-of-way or restoration of existing ORV trails during development of these support activities are examples of what oil and gas exploration/development actions may be most likely affected. Minimal mitigative measures would be applied to surface-disturbing activities in order to provide for ORV motorcycle pursuits within the area.



**SMA NO. 22** - This 55,800-acre area has two significant resources. The area is a large oil and gas producing area. It is also used by a local motorcycle club for recreational ORV use. The draft RMP gives priority use to ORV use.

**\*\* Basis For Recommended Revisions \*\***

Special stipulations as per the draft RMP could possibly lead to additional drilling costs. Furthermore, drilling locations are selected to maximize recoveries. Moving a location to preserve an ORV trail or use area could result in drilling an unsuccessful well (dry hole). Oil and gas activities must take precedence over recreational ORV use.

**Recommended Revisions:**

**ALTERNATIVES B AND C**

Same as Alternative A.

**ALTERNATIVE D**

**Objective:** To manage 55,800 acres for minimizing ORV use conflicts with other important resources.

**Prescriptions:** Highlight recreational ORV permits to ensure that all activities are compatible with oil and gas development. Authorize ORV events within the area. Continue full fire suppression.

**Rationale:** As stated above, this area is popular for enduro events and is also used extensively for random motorcycle and other recreational ORV use. Parts of the area are also heavily developed and developing for oil and gas. Trail avoidance or reroutes should pose no management problem as long as there is appropriate coordination.

**NOTE:** Table of prescriptions on page E-77 should eliminate "special stipulations" for oil and gas activities for all alternatives.

**SMA NO. 23** - The 6000 acres in this SMA are comprised of 13 separate tracts along the Pecos River. The tracts each extend 1/4 mile on each side of the river. The RMP proposes this SMA is important for riparian habitat, soil stabilization, and recreational activities, especially fishing.

**\*\* Basis For Recommended Revisions \*\***

38-22

See response to comment 29-1.

38-22

38-23

The draft RMP stipulations and restrictions for oil and gas activities are unnecessary. Recreational activities can be enhanced, and soil erosion can be reduced without the NSO - oil and gas stipulation. This stipulation would likely eliminate the potential for oil and gas development, which directly conflicts with the FLPMA. Oil and gas activities can be pursued simultaneously with recreational activities. Recommended Revisions:

#### ALTERNATIVE B

Same as Alternative A.

#### ALTERNATIVE C

Objective: [No change from Draft RMP/EIS.]

Prescription: Same as Alternative A for 120 acres at Red Bluff Reservoir, except for adding the exclusion of livestock use, and closing it to solid leasable minerals. Designate a total of 6000 acres (a half-mile wide corridor) as a Special Recreation Management Area (SRMA). Apply protective restrictions on locatable minerals (1729 acres), mineral material sales, recreational ORV use, and full fire suppression.

Rationale: [No change from Draft RMP/EIS.]

#### ALTERNATIVE D

Same as Alternative C.

Texaco appreciates the opportunity to comment on the Draft RMP/EIS, and would appreciate your serious consideration of our recommendations. We believe that the recommendations and revisions made above will provide for protection and management of all natural resources in a way that will maximize resource values through multiple use management.

Under Alternatives C and D, the NSO stipulation is necessary to meet the management objective for the SMA and meet the responsibilities outlined in E.O. 11990 Protection of Wetlands. Under Alternative B, the NSO stipulation would not apply. With directional drilling techniques, most, if not all, subsurface federal oil and gas reserves could be reached within the half-mile-wide corridor.



STATEMENT OF TEXACO U.S.A.  
MAY 7, 1986  
UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT  
CARLSBAD RESOURCE AREA  
DRAFT RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT

My name is Joe King. I am the District Manager of the Hobbs District for Texaco Inc., Producing Department, Midland Operations Division. We appreciate the opportunity to comment at this hearing.

The BLM personnel who participated in the development of the Draft Resource Management Plan are to be complimented for their efforts. Texaco certainly agrees that the nation's natural resources should be managed wisely. Our comments today are compatible with this goal.

Texaco has a long and amicable working relationship with the Bureau of Land Management (BLM) and its predecessors in Southeast New Mexico. We are the largest oil operator, and among the largest gas operators in this part of the State, which includes the Carlsbad Resource Area.

We recognize the Federal government's interest in managing natural resources in a way that will maximize the resource values for the public. However, the Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) has not demonstrated that the additional restrictions imposed on the drilling and production industry promote the objective of the Federal Land

Policy and Management Act of 1976, often referred to as FLPMA. This objective is to maximize resource values through multiple use management. The concept of multiple use management to maximize resource values does not appear to have been equitably applied in the Draft RMP with reference to the oil and gas minerals in the Carlsbad Resource Area (CRA). It should also be recognized that the Draft RMP understates the economic and social impact of Alternatives B, C, and D on the oil and gas industry and the local economy. Alternatives B, C, and D would produce significant adverse short term and long term effects.

38-24

38-24

See response to comment 20-2.

For the most part, the Draft RMP appears to adhere to the prescribed regulatory procedures. However, it does fall short in several respects:

1. One of the main tenets of FLPMA - multiple use management - has not been fully carried out. Specifically, the value of oil and gas as a natural resource does not receive equitable treatment in the Draft RMP.
2. The national policies of reducing this country's reliance on imported oil and gas, by ensuring continued development of energy resources, would not be furthered by the restrictive Alternatives described in the Draft Resource Management Plan.



38-25

3. Early notice of the planning activities was inadequate to allow meaningful participation in the planning process by the oil and gas industry.

38-25

See response to comment 11-2.

38-26

4. The Draft RMP fails to assess both the true economic impact of each Alternative on the oil and gas drilling and production industry, and the resultant impacts on the local and State economies.

38-26

See response to comment 20-2.

I will now discuss each of the objections to the Draft RMP.

1. As defined in 43 CFR 1601.0-5(f), "multiple use means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people...." The multiple use objective of FLPMA has not been fully carried out by the Draft RMP. In several instances, unnecessary restrictions are placed on oil and gas development, when less severe restrictions would afford adequate protection of the other natural resources.

The oil and gas industry has proven that it can operate in sensitive areas in harmony with nature and consistent with the Federal government's concern for these other resources. The industry can continue to do it here in the Carlsbad Resource Area. There is no need to impose

38-27

The Guadalupe Escarpment Scenic Area was divided into two management zones so that undue restrictions on multiple uses would not occur. NSO only applies to zone 1 or 11,700 acres of the entire 49,570-acre SMA. With the entire Resource Area designated from moderate to high in oil and gas potential, zone 1 is considered moderate, with no development. This virtually unaltered natural landscape has a high visual sensitivity from several observation points, including along U.S. Highway 180, other existing roads within the area, and from locations along the Guadalupe Escarpment on BLM, USFS, and NPS administered lands.

38-28

Based on data received, the prescriptions have been changed for this SMA (see FEIS Chapter 2).

no surface occupancy (NSO) and other stringent restrictions on drilling and production operations in the proposed Guadalupe Escarpment Scenic Area (SMA No. 20) in order to protect its natural scenic beauty.

38-27

Similarly, it is not necessary to restrict drilling in the proposed 89,360 acre Los Medanos Raptor Area (SMA No. 13), or to prohibit drilling within one-fourth mile of a raptor nest. It is a fact that the raptors which these restrictions are designed to protect actually choose to nest in the structures present at drilling and production facilities, without any apparent adverse impact to the raptors. Since none of the raptors in the proposed SMA are "threatened or endangered" species, there is no justification for stringent restrictions on drilling and production activities.

38-28

2. Our national interests are not served by unnecessarily curtailing oil and gas development in the Carlsbad Resource Area over the next 20 years. As stated in 43 CFR 1610.1, the first factor to be considered as guidance in the preparation of RMP's is national level policy established by President or the Congress. One of our national policies is reducing our dependence on imported oil. As mentioned throughout my testimony, the Draft RMP imposes unnecessary restrictions on oil and gas exploration and production operations. Such



restrictions clearly appear to be contrary to national policy established by the President and Congress, especially when viewed in light of the fact that oil and gas operations are compatible with protection of other natural resources.

3.

The oil and gas operators in the Carlsbad Resource Area were not given adequate public notice and an opportunity to meaningfully participate in the preparation of the RMP, as required by 43 CFR 1610.2(a). The regulations specifically state that the public notice and opportunity for participation "should be appropriate to the areas and people involved" or affected by the RMP (43 CFR 1610.2(f)). It is common knowledge that oil and gas drilling and production is one of the dominant industries in Southeast New Mexico. On page 3-35 of the Draft RMP, it is stated that "mining/oil and gas interests are intensely concerned about planning decisions affecting permitted land uses." Yet, it was only with the publishing of the Draft RMP/EIS that the vast majority of affected oil and gas operators were made aware of the RMP process. Needless to say, there was little or no participation by the oil and gas industry in any of the planning process leading up to the Draft RMP. We believe that the public notice and opportunity for participation was not appropriate to the areas and people involved, and was, therefore, inadequate. In

38-29

38-29

See response to comment 11-2.

38-29

[this regard, Texaco, and, I'm sure, other industry representatives, stand ready to assist in the RMP planning process.]

4.

[The Draft RMP understates the true economic impact that Alternatives B, C, and D would have on the local economy; including the oil and gas industry. In this regard, it fails to adequately fulfill the requirements of 43 CFR 1601.0-8 and 1610.4-6.]

It is stated in the Draft RMP, that none of the Alternatives are considered to impose a significant economic impact on the oil and gas industry. On the contrary, the Alternatives would impose a significant adverse impact on the industry and the local economy. It is possible that the economic impact statements in the Draft RMP were based on assumptions, such as the following, that are found in the section titled

"Assumptions for Impact Analysis:"

- a. "The overall rate of oil and gas development will continue at or near present levels," and
  - b. "The price of oil and natural gas will not experience any major changes in price."
- Neither of these assumptions are valid today.

[Recently published estimates made by the Federal Reserve Board of Dallas indicate that each 10 percent

38-30

See response to comment 20-2.

38-30



Decline in real oil prices yields approximately a 10 percent decline in employment in the oil field machinery and oil and gas extraction sectors. It is evident that decreases in oil prices translate directly into decreases in net profits. Likewise, higher operating and development costs also result in a decrease in net profits. In today's economy, it is, therefore, reasonable to expect a clear relationship between decreases in net profits due to stricter regulations, and reductions in both oil and gas production and employment.

38-30

The economic impact of the various Alternatives must be considered anew in view of the significant changes the oil and gas drilling and production industry is currently facing, and is likely to face in the foreseeable future.

For these reasons, the Draft RMP/EIS should be revised to take into account the recommendations presented above. We expect to submit additional comments prior to the close of the comment period.

Thank you for the opportunity to present Texaco's concerns with regard to this proposal.

408 Southern Sky  
Carlsbad, NM 88229  
6 June 1986

Charles Dahlen, Area Manager  
Carlsbad Resource Area BLM  
101 E. Hermod  
Carlsbad, NM 88220

Dear Sir:

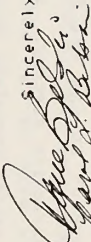
We would like to recommend that the BLM adapt "ALTERNATE D" of the February 1986 "Carlsbad Resource Area Resource Management Plan, Environmental Impact Statement, Draft". This alternate to the plan would, in our estimation, offer better protection for the fragile cave environments located within the Impact Area. These are listed under the Special Management Areas.

We would also like to recommend that KFFC (Komensky's Fantastic Fabulous Caverns) be included as a special management area. This cave contains many fragile and rare speleothems and without protection will be lost as a resource.

We also recommend Alternate Plan D be enacted to insure adequate protection for wildlife which is threatened in the resource area. The main areas requiring protection, in our opinion, are:

- Seven River Hills
- Chosa Draw Caves Complex
- South Texas Hill Canyon
- Dark Canyon (adjacent to Carlsbad Caverns N.P.)
- Lonesome Ridge
- Springs Riparian Habitat
- Yeso Hills
- Bluntnose Shiner Habitat
- Little McKittrick Canyon
- Los Medanos Raptor Area
- Pecos River Canyons (Pierce and Cedar Canyons)

Thank you for consistently seeking public input on BLM resource management. We feel it is especially important for everyone to be able to express their concerns and priorities in the management of public lands.

Sincerely,  
  
Dave and Carol Beliski

39-1

This is a cave which was rediscovered by local cavers just prior to the release of the draft RMP/EIS to the public for review. The cave was apparently discovered initially in the 1960's. Sufficient data exists about the cave and its contents to determine that it does require intensive management measures. FEIS Chapter 2 includes this cave as a cave management unit within the Cave Resource SMA.



Box 2489  
 Carlsbad, NM  
 88220  
 7 June 1986

Mr. Charles S. Dahlen, Area Manager  
 Bureau of Land Management  
 P. O. Box 1778  
 Carlsbad, NM 88220

Dear Mr. Dahlen:

I am writing as a representative of the Carlsbad Citizens for Responsible Land Management (CCRLM) in response to the Resource Management Plan/Environmental Impact Statement for the Carlsbad Resource Area. The CCRLM is a local group of citizens concerned about land use policies and environmental concerns in southeast New Mexico. The group has met and discussed the pros and cons of the various alternatives considered in the RMP/EIS and would like to provide input from our organization as to what we feel would be the best choice to pursue.

We believe that in most cases Alternative D provides the best protection for land and wildlife concerns. However we also think that Alternative C would provide much the same protection and would provide a viable and worthy compromise. We understand the economic concerns against either of these alternatives but feel that much of the negative reasoning is unrealistic and self-serving. Although we prefer many of the proposals in Alternative D, we can heartily support Alternative C.

We would especially like to commend the BLM in regards to the Special Management Areas (SMAs). This aspect of the RMP/EIS recognizes biologic, cultural and geologic significant areas that occur on BLM land in southeastern New Mexico. This is a program that is long overdue. We fully recognize, and wish all other concerned parties could do likewise, that this accounts for a very small percent of land under consideration (about 2%) but that on that land are the truly important, environmentally significant or historically significant areas.

While we support the BLM's current planning efforts we would also like to remind you that wildlife and wildlife habitat constitutes a major aspect of our public lands and we therefore request that the BLM give these resources equal consideration along with other multiple programs; i.e. grazing, oil and gas extraction, ORV use and hunting.

What is decided during this process will have an impact on generations unborn. It is better to err on the side of being a

bit too cautious than a bit too reckless. We can always go back and amend things if we have set aside or preserved unnecessary areas. But we won't have that option if we allow a fragile area to be altered or destroyed and then later decide it should have been managed differently. We support Alternative C and strongly urge its adoption.

Would you please place our organization on your mailing list for any future notices and announcements relating to BLM land and programs here in southeast New Mexico?

Sincerely,

*Steve West*

Steve West  
 Co-Chairman,  
 Carlsbad Citizens for Responsible Land Management

Box 2489  
 Carlsbad, NM  
 88220  
 8 June 1985

Mr. Charles S. Dahlen, Area Manager  
 Bureau of Land Management  
 P. O. Box 1778  
 Carlsbad, NM  
 86220

Dear Mr. Dahlen:

I would like to thank you and your staff for providing me with a copy of the Resource Management and Environmental Impact Statement (RMP/EIS) for the Carlsbad Resource Area and for having the opportunity to comment. I can fully appreciate the amount of work that went into preparing that document.

It should be important to realize, as some opponents of the various alternatives fail to do, that the lands involved that would be better protected account for a very small portion of BLM land in southeastern New Mexico. Even under Alternative D, which is the most environmentally restrictive of the four main alternatives involves only a very minor fraction of the land. Alternative D1 would of course have a greater impact but at this point there seems to be very little support for that choice. I personally prefer Alternative D because it does provide additional buffer zones around the Special Management Areas (SMAs). We are dealing with some elements here for which we do not know exactly what needs to be done to provide the best protection. For example, it may turn out that with more public land use by individuals, more protection may be needed to preserve the integrity of the Phantom Heronries. We just don't know the answers to all of these questions but RMP/EIS is at least a first step.

Over most of the years that I have lived in this area and been concerned about the environment, the BLM always seemed to provide the least concern for the environment. The land was there to use for ORV use, oil and gas extraction and exploration, hunting and grazing but at least in the past, the concept of environmental concern was not a part of the multiuse plan. That has, however, started to change. As was said earlier, even if there is not a lot of pre-environmental concern in the Carlsbad Resource Area, this is more than just of regional concern. This land belongs to every American, whether he or she works in the oil fields of Lea County, grows potatoes in Maine, or is a retired civil servant living in Washington. It doesn't matter whether that person



page 2  
8 June 1985

works on this land everyday, or has never even been to New Mexico. The important thing is that every American has title to this land, not only the oil industry, ORV users, hunters or ranchers. This is not to say that the land should be locked up and only environmentalists, bird-watchers, etc. should have it to use. But by proposing greater restrictions on a small portion of land, we are impacting only about 2% of the total.

Although I personally support Alternative D, I would be happy to see Alternative C implemented. However I do think that for each of the SMAs, if Alternative C is chosen, that monitoring must be continued at each and every site with the idea that if Alternative C does not provide adequate protection, other steps can be taken to provide this. Although most of the work that I do deals with birds, mollusks or caves, I am concerned about the total impact of man's activities on these public lands.

Appendix E provides great detail on the SMAs. I found the maps very useful although I am a bit concerned to find them with the report. I note that the maps for cultural and cave SMAs were not included in order to provide better protection for the various resources. I would have been happy if the maps had been totally eliminated from the work and maps had been available for public viewing in the Carlsbad office.

Lonesome Ridge SMA No. 5: The status of Chaplin's Columbine (*Aquilegia chaplinii*) should be carefully monitored in this area. Although the main population of this endangered species is on forest land, I do not feel that the USFS is adequately concerned about this species status. I have found this species in several spots in the bottom of Big Canyon and feel that at least annually an attempt should be made to determine the population and distribution of this species on BLM lands.

Springs Habitat: Because of the fragility of springs, especially in desert areas, protection for these areas must be implemented as soon as possible. Grazing should be totally eliminated from spring sites themselves and the areas should be fenced in to protect against cattle trampling what little vegetation is not eaten. Water outflows can be provided elsewhere at these sites but cattle should be totally excluded from any of the actual spring sites.

Little McKittick Draw: According to Taylor's study, the New Mexico Ramshorn Snail is a true living fossil. Until this population was found this species was known only as a fossil. The population is very fragile, virtually nothing is known about the environmental requirements, and there is unfortunately little concern for endangered invertebrates. Of all the SMAs, this one is probably the most critical because of what is at stake.

41-1

The Bureau conducts inventories and sends documentation on the status of all known State Endangered plant species on public lands to the New Mexico Department of Natural Resources.

41-1

Los Medanos Raptor Area: Not only should this area be managed with an emphasis on habitat protection, I feel that some sort of public education program should be instituted to provide locals with a better understanding of the role that raptors play in the environment. It will do only partial good to protect the nesting sites when many dozens of raptors are killed on public land by some hunters and weekend shooters. A program through the schools, perhaps in connection with the National Park Service, would produce at least an increased amount of public awareness. It might even be that the New Mexico Department of Game and Fish and the US Forest Service would participate.

Phantom Heronries: The Great Blue Heron nesting site is probably unique for this species. Herons are normally not found nesting in desert situations and this site should be continually monitored. I will be banding from this heronry with USFWS bands but additional work is needed here. ORV use should be severely restricted in this area, at any time of the year, whether the herons are currently nesting or not. Again, we just don't know how much stress the birds can take before they abandon this site or before production drops off. This again is a small area in the total picture but total protection should be implemented. Banding will hopefully provide us with some idea of movements, population and age structure but until we have that information we have to treat this area very carefully.

Although not mentioned in the SMAs, another very significant heronry is found partly on BLM land. On the Jal highway, at mile marker 2 and to the north is a series of very large heronries composed mostly of Black-crowned Night-Herons and Snowy Egrets. Tricolored Herons and Little Blue Herons also nest there virtually every year; the only site in New Mexico where this occurs. The birds are nesting in old saltcedar in the lake just on the north side of the highway and at Lindsey Lake about a mile to the north. Since 1979 I have banded over 1,000 birds there and have had night-heron recoveries into southern Mexico. This is probably one of the five largest inland heronries in the United States and is in a delicate situation because of its close proximity to the highway. Part of this area is on state land and part is BLM but steps should be taken to monitor this population and to see that oil drilling, ORV use or weekend hunters don't destroy this heronry.

I believe that ORV use should be restricted throughout BLM lands because of the fact that so much ORV use, much of it illegal, is already taking place. People must be educated and violators must be fined and made examples of in order to help spread the word. I am not against all ORV's, but it seems that many of them are not acting very responsibly.

I would also like to ask if the BLM has considered the use of

41-2

This area has been evaluated and included within the Phantom Banks Heronry SMA in Chapter 2 of the FEIS.

41-3

See response to comment 19-2.

41-4

At the present time, the BLM is monitoring several prescribed and natural burn areas to assess the impacts of fire on mesquite. It appears that prescribed fire may be an effective tool in controlling some types of mesquite invasions.

41-2

41-3

41-4



page 4  
8 June 1986

41-4

fire as a management tool in controlling the spread of mesquite rather than use of herbicide use. It seems this would be much more natural, cheaper, and less damaging to other elements of the environment than the large scale use of herbicides.

In addition, in several areas I have noted that cattle are grazing the bottom layers of hackberry, Mexican walnut and soapberry stands that are occasionally found in this area.

This has helped to destroy small wooded areas that many other animals are dependent on. At one spot on BLM land, this disturbance has resulted in the abandonment of several Bell's Vireo nests. The vireo is a state listed species and is under consideration for Federal listing. Is there any way to fence these areas off so that cattle can be excluded from Bell's Vireo nesting areas? This would result in successful vireo nestings and eliminate destruction of young trees trying to grow in these areas.

41-5

41-5

Alternatives B, C and D express the BLM's goals to improve and intensively manage riparian habitat.

As it appears that not all inventories have been completed I would also like to urge that this be a high priority. If we don't know what we have, we really can't protect it.

I thank you for this opportunity to provide input and am very interested in helping in any way that I can. Wildlife and habitat concerns need to be addressed and I feel that this can happen with the implementation of Alternative C.

Please retain my name on the mailing list for any matters dealing with this or any other public lands use in the Carlsbad Resource Area.

Sincerely,

Steve West

Steve West

42

Ogden Farms and Cattle Co.  
159 W. Ogden Road  
Loving, New Mexico 88256  
June 7, 1986

Bureau of Land Management  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Dear Sirs:

A cooperative agreement between BLM and Ogden Farms and Cattle Company on an ATP was first entered into in May 1968. Jim Ogden attempted to work within this plan for several years. Due to limited water development, varied pasture sizes and extreme drought conditions, we were unable to operate within the ATP.

42-1

42-1

As stated on page 3-15 of the DEIS, a number of existing AMPs such as allotment 8087 was never fully developed or implemented. These allotments would be a high priority for implementation in the future.

OFCC has continually rotated pastures throughout management of the Federal, state and private rangelands. We have limited numbers of cattle specifically in an attempt to increase revegetation in various pastures. This has been done by rotational grazing and construction of diversions (bars) across roads, gullies and cattle trails. To expand upon work done by BLM in the early 1970's on water pipelines, an additional 25,000 feet of pipeline and waterings had been installed by the permittee at his own personal expense. Dirt tanks and natural waterholes have been repaired and improved so that the cattle were spread throughout the pastures to maximize utilization of forages.

It is the opinion of the permittee that there is no need for additional water development on the allotment, but there is considerable need for erosion control along oil field roads and some existing washes in various pastures. Of primary concern to BLM also should be vegetation treatment and control of mesquite and other brush treatment. This permittee has requested commitment from BLM to enter into cooperative long-term brush control efforts. OFCC is, and has been, willing to use personal funds to share costs with BLM on long-term brush control. Brush control would greatly enhance the quantity of vegetative grasses and is vital for improvement of this rangeland.



It is extremely difficult to improve range conditions in multiple-use areas where there has been extensive oil field development. Much user of the land, and its natural resources, must share in the responsibility to maintain, improve and return the rangeland to its natural state. A cooperative effort among the ranchers, BLM and the oil and gas industry must be in effect to maximize any rangeland improvement projects.

This ranching unit has been operated continuously by the heirs of the original permittees for 96 years. It has been the policy of the family to maintain and improve the rangeland resources. The economic returns have been limited, and will continue to be due to the harsh desert conditions in which we operate. I feel the ranch can carry the permitted allotment of cattle, except in severe drought conditions, when numbers have to be reduced.

In reviewing the EIS, concerning permit numbers 8067 and 8061, alternative C appears to be the most compatible approach for this ranching unit.

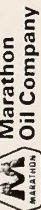
8067 has been designated I category, and should be improved. But, there is no ranch in this area that does not need improvement. If being placed

in the I category will channel funds to this permit for brush and erosion control, then I am in favor of this management action. But if being placed in the I category will solely mean a reduction in the allotment numbers, I am strongly opposed to this placement.

Sincerely,

*James C. Ogden*  
James C. Ogden, President  
Ogden Farms and Cattle Company

P. H. DuVal, Jr.  
Production Manager  
Mid-Continent Region  
Production United States



P.O. Box 552  
Midland, Texas 79702  
Telephone 915/682-1626

June 5, 1986

Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
101 East Mermod Street  
P. O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

Marathon Oil Company is most interested in the administrative proceedings regarding the Resource Management Plan (RMP) for the Carlsbad Resource Area (CRA). Marathon produces oil and gas in the CRA and operates the Indian Basin Gas Plant in Western Eddy County. Marathon has conducted operations for over forty (40) years in the CRA. Marathon identifies the area as a viable source of petroleum resources and continues to maintain a program of production and exploration in the area.

Marathon is opposed to potential BLM programs which restrict further development of resources. Through the years, Marathon has maintained a strong environmental coordination program and supports a program of alternative uses. We believe that the public benefits from the concept of multiple use management which insures availability of access to public lands for a variety of uses. BLM characterized their preferred alternative (Alternative C) as the balanced approach but the BLM's current management program could also be characterized as a well balanced approach. Furthermore, the less restrictive nature of the current program would ensure greater opportunities for multiple use than Alternative C. Accordingly, we recommend that the BLM continue with their current management program, which has been labeled in the RMP as Alternative A.

Regarding the protection of resources, petroleum industry operations are already extensively controlled by numerous regulations of Title 40 of the Code of Federal Regulations. Operating in the spirit of those regulations, the industry has maintained a balanced approach to resource utilization with conservation.

We believe the BLM's guidance (under Title 43) need only fine-tune these other protective measures. The more restrictive alternative plans seem to go way beyond such reasonable guidance.



Marathon commends the BLM for providing a readable statement. However, we believe the concepts presented by the various alternatives have been overly generalized and need further amplification in certain areas:

Marathon understands that the BLM is directed by Part 1610.4-6 of Title 43 to display economic and social effects of the alternatives addressed in the RMP. We note that such a discussion is grossly lacking. The magnitude of petroleum industry operations in the area is such that the economic and social impacts of each alternative should be considered. (The BLM noted that New Mexico ranks fourth among all states in the production of natural gas, and fifth in production of petroleum products. About 90 percent of the State's petroleum and 50 percent of the natural gas production is extracted from that portion of the Permian Basin located in Southeastern New Mexico.)

Allied to economic and social considerations is that of national security. The more protective alternatives of the statement propose to withdraw and restrict lands for resource development. Such withdrawal would appear to be at cross-purpose with national security interests.

Even in BLM's discussion of physical and biological effects the Statement is encyclopedic rather than analytical. Generalization seems extreme. For example, in certain alternatives it is discussed that BLM will prohibit removal of trees exceeding three (3) meters high within an entire management area. In that same discussion, BLM proposes to restrict seismic and drilling activities within one-fourth mile of active raptor nests from April 1 - December 30. Such restrictions leave only a four (4) month window open for drilling operations. To drill and complete a typical 7,500' well takes anywhere from sixty (60) to ninety (90) days. A well drilled deeper than this and with complications, i.e., fishing operations, may exceed this four (4) month time period. Surely the BLM would not require an operator to shut down on April 1 and start-up again on December 31. Furthermore, completion operations or remedial work often can not be forecast. When a well goes down or production declines, work needs to be performed at the earliest time. Not only does the operator lose revenues, but Government loses royalties on lost production from Government lands.

The Endangered Species Act mandates the protection of threatened and endangered species. However, the broad brush approach to protection, found in several of BLM's alternatives, is inappropriate for protection of other species. The burrowing owl, for example, is quite prevalent in the area. And BLM's overly protective measures for the owl such as the restriction of activities within one-fourth mile of active nests, would prove highly burdensome to the Petroleum Industry.

43-1

See response to comment 20-2.

43-2

See response to comments 27-2 and 38-28.

43-3

See response to comment 27-2.

43-1

43-2

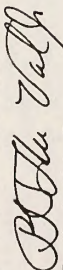
43-3

Marathon conducts production and exploration operations throughout the world both offshore and onshore. A number of such operations are conducted in unique environments. For example, we conduct operations in the Welder Wildlife Refuge of Texas and in the Kenai National Moose Range of Alaska. New Mexico is a beautiful state, and certainly the CRA is another area unique to the nation. However, Marathon questions whether the BLM can substantiate that oil and gas activities are detrimental to wildlife populations in the CRA. Years of operating experience dispute that claim. Marathon believes that BLM's existing management plan for the CRA provides adequate protection of the environment while serving to promote the concept of multiple use management.

From the early 1970's and on into the 80's Marathon has participated heavily in environmental rule making. We would hope that the opportunity for such participation would not be circumvented by administrative processes. Therefore, we hope to be further included as this and other resource management plans are developed for the Western States.

Sincerely,

MARATHON OIL COMPANY



P. H. DuVal, Jr.  
Production Manager  
Mid-Continent Region

PHD/RFM/eg

43-4

Operations in the CRA can often coexist with special guidelines to protect unique species and their habitats in southeast New Mexico. However, certain sensitive areas require more protective management than can be afforded under standard stipulations.



## LEONARD MINERALS COMPANY

3202 CANDELARIA N. E.  
ALBUQUERQUE, NEW MEXICO 87107

606 - 844-8780

June 9, 1986

Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
101 E. Mermod Street  
Carlsbad, New Mexico

RE: Draft Carlsbad  
RMP/EIS

Dear Mr. Dahlen:

Exploration drilling in the area of SMAs Nos. 2(f) Chosa Draw Caves Complex, 7 Yeso Hills and 20 Guadalupe Escarpment Scenic Area Zone 2 of the Draft Carlsbad RMP/EIS has confirmed a very high potential for the occurrence of significant sulphur deposits in the gypsum and anhydrite of the Ochoa Series. The gypsum and anhydrite of these SMAs are continuous with the Ochoa gypsum and anhydrite of Culberson County, Texas, where a number of sulphur deposits have been discovered, including the largest sulphur deposit in the world, the Duval Corporation Culberson Mine located about 28 miles southeast of the Yeso Hills. The closure and/or restriction of sulphur exploration and development as proposed in Alternatives C and D of the Draft Carlsbad RMP/EIS would prevent or deter the exploration necessary for the discovery and development of similar sulphur deposits in New Mexico.

The Yeso Hills-Chosa Draw-Guadalupe Escarpment area portion of the Ochoa Gypsum Plain is not uniquely different from the portion of the Gypsum Plain that continues south in Texas for fifty miles. Caves, sinkholes and barren gypsum exposures are common on both sides of the state line. The "unique gypsophilic vegetation" and "endangered species" of the Yeso Hills-Chosa Draw areas will likely prove to be not unique or endangered if and when the vast portion of the Gypsum Plain that is present in Texas is subjected to the same scrutiny as the current Carlsbad RMP/EIS evaluation of the smaller portion of the Gypsum Plain that is present in New Mexico.

The environmental impact of continued exploration for sulphur in SMA Nos. 2(f), 7 and 20 would be minimal. Closure and/or further restrictions as provided in Alternatives C and D could result in the loss of a valuable and needed resource along with the loss of jobs, taxes and royalties. Implementation of the provisions of Alternative B for SMA Nos. 2(f), 7 and 20 would adequately protect the other resources while providing for sulphur exploration in accordance with the directions, regulations and stipulations of the Bureau of Land Management.

Very truly yours,

*Ben Donegan*  
Ben Donegan  
Regional Manager

BD/se

44-1

See response to comment 28-3.

44-2

Protective stipulations were proposed under Alternatives C and D so that significant resource values could be preserved while allowing for prudent development of other resources.



**Chevron U.S.A. Inc.**  
P.O. Box 670, Hobbs, NM 88240

R. C. Anderson  
Division Manager  
Production Department  
Hobbs Division

45

June 6, 1986

**CARLSBAD RESOURCE AREA  
RESOURCE MANAGEMENT PLAN  
ENVIRONMENTAL IMPACT STATEMENT**

Bureau of Land Management  
Carlsbad Resource Area  
101 E. Mermol  
P. O. Box 1778  
Carlsbad, New Mexico 88220

Attention Mr. Charles Dahlen  
Area Manager

Gentlemen:

Please consider the following comments prior to adoption of any of the alternatives set out in your draft management plan proposal dated February, 1986.

Chevron considers all alternatives to be overly restrictive to oil and gas operations and is very concerned about the future operation of existing wells and the future development of the resources which lie within areas designated for No Surface Occupancy, particularly SMA's No. 2 and 6. The Federal Lea "J" White City Penn leases which we operate appear to lie within the area outlined for that section of SMA No. 2 contained within Zone 2 of the Guadalupe Escarpment Scenic Area SMA No. 20. Chevron also operates two White City Penn gas wells within the area described in SMA No. 6(f) for Blue Spring. These areas are designated for No Surface Occupancy in most of the alternatives in the draft plan which could force abandonment of existing wells. Future development would also be severely restricted or even eliminated due to the increased cost of off-site directional drilling in conjunction with reduced crude oil prices.

45-1

Chevron either holds or is a Non-Operator Joint Venture Partner on several tracts which fall within the boundaries of the Los Medanos Raptor Area described in SMA No. 13. It is unreasonable to restrict drilling and seismic activity within a quarter mile of a raptor nesting site to the first three months of the year since many wells cannot be completed in three months. In addition SMA No. 13 should be limited to those nesting areas for raptors on the endangered species list.

45-2

Finally, Chevron's Environmental Policy requires that we mitigate any adverse impact to the environment caused by our operations. Chevron has been and will continue to be willing to cooperate with government regulatory bodies and others to protect threatened and endangered species, promote development of wildlife sanctuaries, etc. We have

45-1

The effects of no surface occupancy stipulations noted in this comment were described in the Draft EIS on pages 4-15 and 4-16. This comment specifically notes two gas wells within the proposed Blue Spring AUCU, and the fact that (NSO) "...could force abandonment of existing wells." BLM does not intend to apply new NSO stipulations to existing leases, and does not anticipate abandonment of existing wells among the consequences of attaching NSO stipulations to future leases.

45-2

See response to comment 27-2.



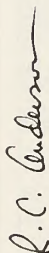
personnel on our Corporate staff with expertise in many of the areas of concern addressed by the SMA's, and we would use this expertise as necessary to minimize any impact our operations have on the environment.

[ Completely banning surface activity in areas with high potential for oil and gas development is much too severe. It would be more reasonable and cost effective for the BLM to deal with individual lease operators in the affected areas on a case-by-case basis in order to work out plans for feasible development projects in otherwise sensitive areas. ]

45-3

45-3

See response to comment 37-20. The BLM will continue to work with individual leaseholders on a case-by-case basis to minimize impacts on oil and gas development while still meeting its commitment to protect sensitive resource values.



R. C. ANDERSON

AGD/ggs

CARLSBAD RESOURCE MANAGEMENT PLAN  
RECORD OF PUBLIC INPUT

Date: June 6, 1986

BRUCE L. WELBORN - DISTRICT MANAGER - SUN EXPLORATION AND PRODUCTION COMPANY

Individual Name and Organization (if applicable)

P. O. BOX 1861, MIDLAND, TEXAS 79702-9970

Address

RESOURCE MANAGEMENT PLAN/ENVIRONMENTAL IMPACT STATEMENT - DRAFT

Issue or Concern

Comments: Sun Exploration and Production Company has always been concerned with cooperating with the Bureau of Land Management for environmental protection and multiple surface use planning. We understand that the Federal Land Policy and Management Act of 1976 has the objective to maximize resource values through multiple use management. It is our opinion that the Draft RMP/EIS does not justify the need for additional restrictions on the oil and gas industry. We have been able to work in a cooperative manner with all surface management agencies.

Sun Exploration and Production Company recommends that Alternative A be adopted for the final RMP/EIS. Special Management Areas number 10, 11, and 14 need to be studied to determine if NSO restrictions are truly necessary and enhancement of multiple use should be assigned. We appreciate the opportunity to comment on the Draft RMP/EIS and believe that by working together we will provide for protection and management of all natural resources in a way that will maximize multiple use management as well as protect the environment.

Signature

Bruce L. Welborn  
Bruce L. Welborn  
District Manager, Sun E&P

FOLD, STAPLE AND DROP IN MAIL BOX

46-1

NSO was not proposed for SMA No. 14. See response to comments 27-7 and 27-8.



IMC FERTILIZER GROUP  
P.O. Box 71 • Carlsbad, New Mexico 88220  
Telephone: (505) 887-2871



INTERNATIONAL MINERALS & CHEMICAL CORPORATION

June 6, 1986

Mr. Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
101 E. Mermod Street  
P. O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

In response to your request for comments on the Draft Carlsbad Resource Management Plan Environmental Impact Statement we have the following:

We especially disagree with and object to the Special Stipulation: Restricted Surface Disturbance in Special Management Area 13 - Los Medanos Raptor Area for the following reasons:

1. It is our opinion that the impact of any disturbance from exploration or drilling on raptor nesting will be minimal.
2. Raptors have been observed nesting near public roads and in the vicinity of mineral processing activities so often as to indicate an insignificant interruption of nesting.
3. The development of a specific mining or industrial activity can be of great importance to the United States. It appears to be very poor judgment to place a specific raptor nesting area ahead of utilization of a rare and valuable mineral deposit.

We also disagree with the No Surface Occupancy Stipulation in the following Special Management Areas:

6 - Spring Riparian Habitat	313 Acres
7 - Yeso Hills	640 Acres
11 - Maroon Cliffs	1,880 Acres
20 - Guadalupe Escarpment	11,700 Acres
Scenic Area	

47-1

See response to comment 27-2.

**LUNDBERG INDUSTRIES, LTD.**  
P. O. Box 31  
Carlsbad, New Mexico 88220  
(505) 887-2844

Tom E. Donaldson  
General Manager  
Carlsbad and Dumas Operations

Page 2

Mr. Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area

We further disagree with the areas closed to leasable solid minerals with the exception of the 13,369 acres presently withdrawn. The total area objected to is 30,607 acres.

Our disagreements of the two preceding paragraphs are based on the belief that our nation has gained its strength and standard of living from its development and use of natural resources. The very base of our history of advancement has been built on mining, agriculture, and fishing. Without these basic industries there can be no civilization. To overreact and restrict these activities needlessly will be counter productive.

The backward condition of undeveloped nations is an example of the failure to use their natural resources to improve the standard of living of their citizens. While the primitive and wild life areas may contribute to the quality of life, the quality of life is meaningless without a high standard of living derived by industry and mineral development.

We sincerely urge that this resource plan be reconsidered and modified to support orderly production of critical materials and minerals as a first priority.

Very truly yours,

*for Clark McNaughton*  
Clark McNaughton, Manager  
Mine Operations

CMC:d

cc: R. W. Houzland  
Joe Skeen, U. S. Representative  
Jeff Bingaman, U. S. Senator  
Pete Domenici, U. S. Senator  
Toney Anaya, Governor  
James Otts, State Representative  
Robert Light, State Representative  
Marvin Watts, State Senator  
Budd Hebert, State Senator

June 9, 1986

Mr. Charles Dahlen  
Area Manager  
Bureau of Land Management  
P. O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

Lundberg Industries, Ltd. would like to comment on the recent R.M.P. (Resource Management Program).

While we do not have any specific complaints, it appears to us that the proposals are biased, mainly in favor of Cultural, Visual and Recreational view points.

On the whole, the R.M.P. is detrimental to both fluid and solid Mineral Development. The cost, resulting from the implementation of any of the several plans, would be significant to the citizens of the area, both in Federal and State income.

Thank you very much for your consideration in this very important matter.

Sincerely,

*Tom E. Donaldson*

Tom E. Donaldson  
General Manager

TED:vs



49



207 SOUTH FOURTH STREET  
ARTESIA, NEW MEXICO 88210  
TELEPHONE (505) 748-1331

S P YATES  
PRESIDENT  
MARTIN YATES, III  
VICE PRESIDENT  
JOHN A. YATES  
VICE PRESIDENT  
B. W. HARPER  
SEC. TREAS.

June 4, 1986

Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Re: Proposed RMP/EIS Plan  
Carlsbad Resource Area

Dear Mr. Dahlen:

Yates Petroleum Corporation appreciates this opportunity to register comments concerning the Proposed Carlsbad Resource Area Environmental Impact Statement.

After reviewing the E.I.S. Plan and attending both the "Open House" and the Public Hearing, it is necessary to comment on several points presented in the plan.

Many operators I contacted were concerned that this E.I.S. was drafted with absolutely no input from the oil and gas industry. Further study indicated neither the Potash or the Ranching groups were asked to supply input. We feel this is unfair since these three groups generate a majority of a revenue for our area. Had we been able to submit information we feel we could have worked with the BLM to create a statement that would have benefited both the revenue generating groups and the BLM.

As you know we are operating under Alternative A. BLM feels this is very lenient. Under "A" we work in many Special Management Area (SMA) which we feel, regulates our operations very closely. The BLM is recommending with the proposal, four new alternatives to place much of the vast SMA acreage under the No Surface Occupancy (NSO) group. Is this necessary? We think not. The EIS plan states with NSO standing many shallow wells will never be drilled. Resulting in loss of revenue. To drill in the NSO, operators will have to directional drill and be willing to pay an extra 40% to complete drilling activities. With the current price of oil and gas, and no relief in site, makes this to be a very expensive proposition for many operators. A challenge which few will take. Again loss of revenue.

We would like the BLM to step back and take a good look at the vast amount of acreage that would fall under NSO status versus the impact to revenue by not drilling in these areas. Does all this acreage really need to be covered by NSO status?

49-1

49-1

See response to comment 11-2.

49-2

49-2

See response to comment 37-20.

The E.I.S. is proposing to cut back in the number of salable mineral areas. Namely Caleche pits. If this is adopted a Catch 22 Situation will soon follow. Now more than ever the BLM is requiring operators in the Carlsbad Resource Area to caleche drill pads and roads but on the other hand the BLM wants to limit the number of existing caleche pits and put strict regulations on any new ones. Many times drill site may fall near an existing federal pit. Should closures occur a location may be miles from an approved BLM pit. Again, the burden of the added hauling expense would fall on the operator while the BLM would receive royalties from caleche sold.

Most operators agree the Carlsbad Resource Area is unique for its archaeology, caves and wildlife habitat. Testimony was given at the public hearing that operators spent money, time, and effort to drill and produce wells in these sensitive areas. Many of these efforts suggested by the BLM (the raptor platform letter of 3-1-83 sent to some operators with wells in these areas for example) were carried out successfully by operators. Many more examples exist of oil and gas facilities being located in sensitive areas with no serious incidents reported. Seasonal drilling and NSO stipulations within 1/4 mile of raptor nesting areas again will limit us from operating. We have shown our willingness to work within the environment. We feel a blanket NSO status is not warranted in these areas. We feel a meeting of concerned operators and the BLM would be a very good start to creating a more realistic solution to coexistence in environmental areas.

In conclusion, we feel the alternatives B-D, offered in the CRA - EIS are too closely related to each other and if adopted will benefit the Environmentalist and the Recreationalist while creating a severe economic hardship not only for the Oil operators, Potash Industry, Ranchers but the economies of Southeastern New Mexico and the entire state.

At this time we would suggest the BLM not adopt any of the suggested Alternatives. We suggest input from the revenue generating groups should be included in a new environmental impact statement.

Sincerely,

YATES PETROLEUM CORPORATION

*Cy Cogan*

Cy Cogan  
Regulatory Agent

CC/tml

Under the proposed plan, only 61,371 acres (2.3 percent CRA subsurface) would be closed to mineral material sales. These areas are closed to protect sensitive resource values. Closure of this limited acreage in scattered areas should not significantly affect oil and gas operations.



6-9-86

Mr. Charles Fahlen, Area Manager  
Carrizal Resource Area, BLM  
101 E. Mesquite  
Carrizal, N.M.

Dear Mr. Fahlen

Thank you for the opportunity to  
respond to the CRA RMP DEIS.

I wish to state my opposition to  
all alternatives except alternative A.

I especially oppose any actions on the  
part of BLM which would include any  
part of my private surface land being  
used or included in the possible

ACEC (Dark Canyon). At this time  
I do not feel that I can cooperate  
in providing any access to Zone  
1 of the Dark Canyon ACEC as  
proposed and alluded to in the  
CRA RMP DEIS.

50-1

50-1

There are 800 acres of private land surface/federal subsurface mineral estate within the boundaries of the Dark Canyon SMA, all within zone 1. The private surface is included within the boundary so that BLM can effectively administer the federal minerals underlying these private lands to meet management objectives for the SMA. However, this does not in any way restrict the private landowner in managing his private surface acreage.

The plan is to some degree threatening to not only my economic welfare (in Alternatives B C D + D1) but the welfare of others in the livestock industries as well as oil and mining industries.

I am Alternative C, as described on page 5-10, where 24,859 AUM would be reduced, this eliminated a ranchers opportunity to increase AUM (that have not been used by him) to take advantage of market increases.

Thank you for the opportunity to respond.

Joe M Steel  
2911 Mt. View  
Carlsbad, N.M.  
88220

50-2

Because the five-year average actual use is 191,515 AUMs, the initial reduction of 24,854 preference AUMs should not affect livestock permittees. The long-term projected carrying capacity of 225,458 will produce additional AUMs with favorable impacts to limited permittees.

50-2



June 9, 1966

Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
101 E. Mermod st.  
Carlsbad N.M. 88220

Dear Reader,

This is a partial review of the Carlsbad Resource Area Management Plan Environmental Impact Statement, Draft.

I am not making a blanket endorsement of any one alternative because the issues are too complex for one simple answer.

Here are some topics that I am interested in:

### CAVES

The McKittrick Hill Caves Complex proposal is very interesting to me. This document proposes to limit surface disturbances on up to 4,920 acres when at the present time there is a drill pad nearly at the top of McKittrick Hill that can be seen in excess of twenty miles on a clear day. I have requested to have this location recontoured several times.

Sometimes people camp on this pad but many the wind is so strong on top (north slope) of the hill that they must move to a more protected location. I believe that the location should be recontoured and a campsite chosen farther east.

This surface area has a caliche road on top of the hill between cave sites at the present time. I would like to recommend that no additional surface restrictions be placed in this area.

Honest Injun Cave is located in such a way to be impossible to disturb with a vehicle and is located next to a major ranch road with oil field traffic. Therefore traffic will not bother much at this site, but it will not be wilderness area again, so I recommend that no further surface action be taken at this site.

I would also like to recommend that the B.L.M. not involve any part of the B.L.M. lands with the National Park Service. The N.P.S. has been more than uncooperative on several occasions and on several in this area. If the N.P.S. is to have any part of planning or administering B.L.M. lands, the B.L.M. should equal to N.P.S. lands/

Rule Book Snail

In appendix B-9, Little McKittrick Draw, S.M.A. no. 9 proposes to establish a 100 acre R.M.A. or perhaps a 500 acre R.M.A. This seems to be a waste of time and money, because in the paper on the status of the New Mexico runs horn snail entitled "Report to the State of New Mexico on a Status Investigation of Molluscs in New Mexico", Dwight W. Taylor stated that "the 2 known populations are stable under present conditions of land use (stock raising)." Why then is the B.L.M. planning to exclude livestock grazing from the proposed special management area for this species when the status report indicates livestock have no detrimental impact?

I have been a resident at my present at my present address for 33 years, and have spent those years in the area covered by this document.

From the description I have of the *Pecosorhis kansascensis* I believe that when climatic conditions are right, this creature can be found in Dunaway Draw, Salt Canyon, Juniper Canyon, Dark Canyon, Stone Canyon, Lecheguilla Canyon, as well as other places where seasonal water can be found.

ACCESS

Access is an emotionally charged issue that sometimes has ranchers and conservationists on one and various recreation interests on the other.

Table F-1 "Comparison of Access Actions by Alternative" shows areas with a reference number for Map 2-2. It has been my observation that areas 12-17 inclusive have all or parts that need some restrictions. These restrictions could be in the form of limiting vehicles to existing roads and trails selected by cooperative agreement between B.L.M., sportsmen, ranchers, and O.R.V.'ers and others that might have a vested interest in this area.

51-1

51-1

51-2

51-1

Additional data on any existing or proposed Federal species would greatly assist the Bureau in management recommendations. An RNA could serve the function of determining effects of livestock on the species by providing a comparison of ungrazed habitat (within RNA) with grazed habitat (outside RNA).

51-2

Access restrictions as well as acquisitions are proposed in areas 12 to 17. Restrictions are proposed to minimize resource conflicts in Special Management Areas (SMA's) which would affect only portions of the larger area in these five units. No needs have been identified which would call for additional vehicle use restrictions in these areas except for limitations imposed on hunters by New Mexico game regulations which apply throughout the Resource Area.



RANGE STUDY AND CONSULTATION

The range study began with much talk about consultation with the rancher as to terrain type, water location, stock usage, etc. . . I traveled one day with B.L.H. personnel, establishing locations for rain gauges, transects, etc. . . We spent all day with this project with no apparent differences on two different allotments. Soon after I noticed that they had moved exactly three out of the six locations. . . What kind of Consultation is that.

When the rain gauges were actually installed many were placed in bushes below the tops. According to the directions that come with the gauges, this will give incorrect readings.

As of 9 June 1986, there are rain gauges nearly full on this ranch. There are also transect sites that have not had a gauge since deer hunting season. This does not make a very accurate study.

I understood that the B.L.H. personnel would notify me before conducting any study, but since the locations were originally picked, no B.L.H. personnel have called or come by except to send a bill or request actual use data.

In conclusion, I would like to state that several B.L.H. personnel have been very helpful in my understanding this document and I would like to thank them for their efforts.

51-3

51-3

Rangeland consultation with permittees began in 1981 on those allotments west of the Pecos River and has continued since that time. Records indicate consultation during all phases of the monitoring study process on allotment #8079.

LIVESTOCK GRADING IMPROVEMENTS

In table D-2a, this document lists specific problems and management actions. This table shows allotment number 0079 to have "lack of management facilities to improve conditions and achieve forage potential."

This ranch has only 9,056 acres of public land. It has 3 large pastures, 2 small pastures, and 2 holding trays. It has 7 windmills, and 3 water catchments. Joining this ranch is a ranch with more than 16,000 acres of public land, with only 1 large pasture and 2 small pastures. One small pasture has no permanent water. This ranch is not on the list of ranches needing improvements. I don't understand how these conclusions were reached.

51-4

51-4

See Appendix D-1, pages D-1 and D-2 for a more complete rationale for the categorization of allotments.

BADLY RAIN DRAINING

Salina, no. 6a is proposed to manage this "spring". This "spring" is a man developed water which is subject to occasional maintenance. For this reason I request that this not be considered a spring but the developed water that it is.

51-5

51-5

This seep constitutes a perennial natural water source on public lands. The Bureau is mandated through Executive Order 11990, Protection of Wetlands to protect and enhance all wetland areas on public lands. Specific management guidelines will be cooperatively developed in a springs Habitat Management Plan (HMP) to provide for the protection of wetland resources and assure livestock use of the waters.



### VANDALS

Vandals are not mentioned in this document. On the Grazing allotments numbers 6079, 9090, and 6114 vandalism is a problem. Vandals have burned a house, cut several fences, shot livestock, windmills, tanks, water troughs, floats, fence posts, and anything else they might see. They have chased livestock with pick-ups, dune-buggies, and motor-cycles. I have many gates that have been damaged by vehicles. Also, many times individuals will come through allotments and leave gates open behind them.

In addition to vandals, we have thieves who steal livestock, gates, traps, and anything else they can carry off.

This document should address this problem.

51-6

51-6

Although the BLM is fully aware of the problem of vandalism and theft on public lands, this problem is covered by State and local laws. Page 2-19, first paragraph states that the BLM will continue its "Operation Respect" program to try to minimize access related problems during the high use seasons.

### PREDATORS

Predators are mentioned in passing on page A-3.

AM-4.1 states that predator damage control will be allowed where need is verified. It is my understanding that any allottee who chooses can prevent work by the Animal Damage Control Division of the Animal and Plant Health Inspection Service of the U.S.D.A. regardless of problems on neighboring ranches.

No other mention of predators is evident in this document which is strange considering the current turmoil in this area involving the mountain lion. I have no recommendation other than that this document acknowledge the fact that predator problems do exist for the cow producers, sheep producers, deer hunters and others.

### BUDGETS

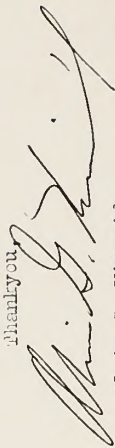
These budgets are a source of amusement to me. The first thing that came to mind is the fact that ~~there~~ is no predator control expenses for the sheep ranches. In some years we spend tens of thousands of dollars in predator control efforts. In fact if I had not been so involved in predator control work (stopping coyotes from killing my lambs), I would have had time to review these budgets in depth.

### CONCLUSION

There are many things that are not addressed in this document. Most of the things important to me have been addressed in my comments, but I did not mention the effects of gas contamination on fences, the effects of brine water on roads, on vehicles or several other problems. The reason for the omission is personal belief that the people of these United States have more Government than we can say grace over much less ~~pay~~ for.

Therefore, if it ain't broke don't fix it, and what ever you do, don't involve the N.P.S. on B.L.M. lands.

Thankyou



Alvin G. Kincaid  
Kincaid Ranch  
1762 Queen Rt.  
Carlsbad, N.M. 88220  
887-9458



June 9, 1986

Charles Dahlen  
Carlsbad Resource Area  
101 E. Mermel  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Dear Sir,

We have read the Carlsbad Resource Area Management Plan with much amazement and dissatisfaction.

If you will look at a map of New Mexico you will notice this is a semi-arid desert area. This area would not even support any nomadic Indians. They roamed in & out according to the amount of rainfall. When the first white settlers came to this area they tried farming & ranching but the ability to survive was only brought about by the discovery of our natural resources: oil, gas, potash, sulphur, & other minerals. Without us being able to produce these products & create employment there will not be any people here to hunt or look at the scenery.

We, the ranchers, were never consulted on any of the changes suggested in your draft, including alternatives A thru D. You have put hunters, ORV, & environmentalist ahead of the oil, gas, sulphur, other minerals, & ranching industries. In this resource management plan you write of hunters, ORV, environmentalist people the right of this free excess of land. Do you think they pay as much as the mineral & ranching industry does in proportion. For example: In the State of Texas, we have to buy a hunting license & then we have to pay to hunt on someone's land. No one has seemed to have considered what it would cost in the loss of jobs & revenue to the Federal, State, & Local Government if your plan were implemented.

We hesitate in our daily routine of ranching to drive down a fence line to check the fence or drive across a pasture to check livestock for fear that, with your explanation of ORV rights, this will become a permanent road.

52-1

See response to comments 11-2 and 51-3.

52-1

New Mexico Cactus-Succulent  
Society  
c/o Steven Brack  
PO Box 72  
Belen, NM 87002

To: BLN-Carlsbad Resource Area Resource Management Plan

Below are comments relative to the plan, to bring attention to special plants that we in the NM Cactus + Succulent Society know occupy the areas of consideration:

Seven River Hills - In this area is a very good probability to find Echinocereus lloydii, a federally listed species. Before disturbance is allowed or planned, a survey should be undertaken to search for the occurrence of this plant here.

Chosa Draw Caves Complex: we can not comment to the occurrence of federally protected plants here as the local area has never been visited by a member of our Society that is familiar with the cacti.

South Texas Hill Canyon: It is possible that Echinocereus lloydii would occur here, so a survey for it would be in order.

Mark Canyon: It is very likely that Coryphantha sneedii v. sneedii occurs here, a federally protected species. There is also a chance that Echinocereus lloydii would be found here as well.

Lonesome Ridge: Coryphantha sneedii v. sneedii is very likely to occur here as it is found in nearly all of the canyons along the escarpment of the Guadalupe Mountains south of the visitors center at Carlsbad Caverns Nat. Park to near the Texas/NM state line. Here there is also a good chance that Echinocereus lloydii occurs, which is widespread ~~xxx~~ but never common.

Pecos River Canyons: In this area there is a very good chance that Echinocereus lloydii would be found.

We at the NM Cactus + Succulent Society are very much in favor of setting up the ACEC management areas. Far from all is known about the rare and sensitive plant populations, and if possible setting aside areas for study is an idea we very much support. We would be in a position to help survey regions for the occurrence of rare and sensitive protected plant species to document their occurrence.

Steven Brack

We know what causes the abundance of wildlife game. It is the amount of rainfall but also with your liberal definition of ORV some areas are over hunted.

New Mexico Wildlife & Game Department does not feel it is necessary to visit with the farmers or ranchers to find out the availability of wildlife & to establish limits & length of seasons.

Your draft suggesting that curtailment of natural resource exploration & development of these areas during mating season would be of no benefit to wildlife & detrimental to our economy.

It is our knowledge that there is basically the same amount of wildlife today as there were 50 years ago. We know this because we were here.

We have all enjoyed the fruits of being able to work hand in hand with the BLM & hopefully can maintain this working relationship.

Cordially,

W.H. Branstetter Drawer H, Sal, NM.

Lease # 067-6514

067. 6854

W.H. Branstetter 6078

Diminished Cattle Co.  
By M. Branstetter  
P.O. Box 302  
Sal, N.M. 88252





54

Department of Energy  
Albuquerque Operations Office  
Waste Isolation Pilot Plant Project Office  
P. O. Box 3090  
Carlsbad, New Mexico 88221

JUN - 9 1986

Mr. Charles Dahlen, Area Manager  
Carlsbad Resource Area  
101 East Mermod  
P.O. Box 1778  
Carlsbad, NM 88220

Dear Mr. *Charles Dahlen*

The WIPP Project has reviewed the BLM Resource Management Plan/Environmental Impact Statement and have found no major conflicts between this document for the Carlsbad Resource Area and construction, operations, decommissioning, and post-closure plans for the WIPP. Several questions and comments have been raised, however. These are:

1) BLM lands which are being offered to the State of New Mexico in exchange for lands within the WIPP site are not identified on Map B as "Disposal Areas." Does this preclude BLM from effecting the exchange as currently proposed since this exchange will result in a net reduction of Federal lands outside a designated disposal area?

2) While the WIPP site has been designated in its entirety (10,280 acres) as being closed to Mining Claim Location, Oil and Gas Leasing, and Solid Minerals Leasing, only 160 acres of the WIPP site will be closed to Mineral Materials Sales. Will this policy remain in effect following legislative withdrawal of the WIPP site? It is assumed that following permanent withdrawal of the land, any mineral or hydrocarbon leasing activity including sales of mineral materials within the WIPP site boundary will be done only with the concurrence of the DOE.

3) One area proposed for limited fire suppression (Map D, Area 11) lies along US Highway 180 between Carlsbad and Hobbs. This route is a designated transuranic waste transportation route. Potential radiological impacts exist if fires in this area result in traffic delays or in re-routing traffic since no alternative routes are available for waste haulage. Please comment on the potential for extended traffic delays resulting from fires in this area.

54-1

The WIPP State Land Exchange should be completed before the legislative withdrawal is enacted. At the time the exchange takes place, there will be no net reduction in Federal land. The WIPP withdrawal can then take place as described in the proposed RMP.

54-2

The closure of all mineral leases and mining claims will remain in effect following the legislative withdrawal. Mineral material sales is a discretionary action and would be done only with the concurrence of the DOE while the land is still under our administration. After the withdrawal, the land will no longer be under the administration of BLM and mineral material sales would not be within BLM jurisdiction.

54-3

The area in question (Map D, Area 11) is limited suppression only in that heavy equipment will not be used in the suppression of wildfire in this area. Alternate methods of fire control and suppression will be used to combat wildfire in this area.

4)

The management practices on BLM lands adjacent to the WIPP site is not adequately treated in this document to allow informed comment. Detailed descriptions of proposed range management plans in the area of WIPP are presented in a previous document, the East Roswell Grazing EIS, and only the general decisions for range management are presented in the RMP document (Appendix A). Some of these decisions could affect WIPP programs if applied to one or both of the allotments adjacent to the WIPP site. These decisions are:

RM-1.2 and -1.4 Performance of vegetation treatments and development of intensive grazing systems on some allotments.

W-1.1 and -2.1 Application of mesquite control in needed areas with adequate provisions for wildlife.

WL-1.4 and -3.4 Reduction of mesquite and creosote canopy cover.

All three of these decisions imply the possibility of shrub eradication on rangeland adjacent to WIPP. Intensified grazing systems and habitat improvement for game species could alter the demographic patterns within or near the WIPP site by increasing the use intensity of ranch personnel and hunters. WIPP should be included in the review cycle of the EA's prepared for the adjacent grazing allotments which are required prior to vegetation treatment.

5)

All alternatives (except Alternative A) include provision for a Los Medanos Raptor Area that has an irregularly shaped perimeter located one to six miles outside the WIPP withdrawal area (see Map D in the document). Management stipulations proposed for this area include a restriction on drilling within a 0.25-mile radius of nesting sites from April 1 to December 30 of each year. This restriction is specific to oil and gas drilling, but since it is intended to prevent disturbance of nesting sites, it will likely apply to other similar field activities as well.

Due to WIPP's ongoing commitment to the Los Medanos Raptor Research Program, WIPP should support Alternatives B, C, D, and D1 for recognizing the Los Medanos Raptor Special Management Area and the concomitant restrictions on oil and gas drilling activities during critical times in the breeding season of these birds. WIPP should also support the closure of the raptor SMA to off-road vehicle use.

54-4

The BLM will continue to implement the land use decisions contained in the East Roswell Grazing EIS as they are mandated by law, regulation, and policy to achieve multiple use management objectives on public lands. Our EA files are available to the public and open for review.

54-4

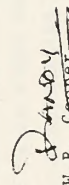


## 6) Specific Comments

- 54-5** a. p. 2-4, 1st col., 3rd paragraph  
Landfills should be investigated (limited sampling and analytical program) before BLM divests its potential liability. If such investigation is not performed, there will be no clearly responsible party to fund remediation if problems are discovered in the future. Additionally, a limited investigation would help BLM to defend itself from problems caused by post-BLM divestiture practices at the landfills.
- 54-6** b. p. 3-3, 1st col., last line  
A very misleading typographical error appears - 9.600 should be 9,600. Also, the sentence seems incomplete.
- 54-7** c. p. 3-3, 2nd col., 4th paragraph  
The words "transuranic (low level radioactive)" should be replaced by "national defense activity generated transuranic radioactive."
- 54-8** d. p. 3-4, 2nd col., 4th paragraph  
A year should be provided for statements concerning New Mexico's rank in gas and oil production. Information is not current.
- 54-9** e. p. 3-6, 2nd col., 3rd paragraph  
A year should be provided for statements concerning percentage of potash produced in CRA. Information is not current.
- 54-10** f. p. 3-7, 1st col., last paragraph  
Deposits should be referenced as sodium chloride not "sodium."
- 54-11** g. p. 3-10, 2nd col., 4th paragraph  
The presence of hazardous waste in unattended disposal pits and sanitary landfills is highly likely. Substantiating data or information should be provided for statements to the contrary.

If you have any questions regarding these comments, please contact me or Dick Crawley of my staff.

Sincerely,

  
W.R. Cooper  
Project Manager

54-5

There is a program which requires limited sampling and analysis of landfills prior to BLM divestiture.

54-6

This typographic error has been noted. The sentence should read... "An additional 9,600 acres to support the WIPP project is pending congressional action for withdrawal," and has been changed in Chapter 3 of the FEIS.

54-7

Correction has been made in the FEIS, Chapter 3, Additions and Corrections to the Draft.

54-8

Information has been included in the FEIS Chapter 3, Additions and Corrections to the Draft.

54-9

The DEIS does show a year concerning percentage of potash produced in CRA (1982) on page 3-6.

54-10

Correction has been made in the FEIS, Chapter 3, Additions and Corrections to the Draft.

54-11

Landfills and disposal pits are periodically inspected by the BLM. If any hazardous waste is suspected, an assessment of the site would be required by BLM.



## NATIONAL WILDLIFE FEDERATION

1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800



## NATIONAL WILDLIFE FEDERATION

1412 Sixteenth Street, N.W., Washington, D.C. 20036-2266 (202) 797-6800

June 6, 1986

Mr. Charles S. Dahlen, Area Manager  
Bureau of Land Management  
Carlsbad Resource Area  
101 E. Mermol Street  
P.O. Box 1778  
Carlsbad, New Mexico 88220

Dear Mr. Dahlen:

As was agreed upon in your conversation of June 5, 1986, with Suzanne Arnold, the National Wildlife Federation is submitting its comments on the Carlsbad Resource Area Plan/EIS on June 10, 1986.

The National Wildlife Federation is the nation's largest conservation/education organization, with 4.5 million members and supporters in 51 states and territories, including the State of New Mexico. Therefore, we appreciate the opportunity to comment on the management plan for the Carlsbad Resource Area.

Sincerely,

David Alberswerth  
Director  
Public Lands & Energy Division

Enclosure

## COMMENTS OF THE

## NATIONAL WILDLIFE FEDERATION

## ON THE

## DRAFT CARLSBAD RESOURCE MANAGEMENT PLAN/EIS

Submitted by

David Alberswerth, Acting Director  
Karl Gawell, Legislative Representative  
Kathleen Zimmerman, Counsel  
Kathleen Patnode, Conservation Intern

Public Lands and Energy Division  
Resources Conservation Department

June 6, 1986



## INTRODUCTION

The National Wildlife Federation is the nation's largest conservation/education organization, with 4.5 million members and supporters in 51 states and territories, including the State of New Mexico. The primary concerns of the National Wildlife Federation in the proposed Carlsbad Resource Management Plan relate to the following issues: the continued reliance for management direction on a Management Framework Plan for a substantial proportion of the lands within the Carlsbad Resource Area; withdrawal review; special management area designation and management; oil and gas leasing and development; livestock grazing; terrestrial habitat management; riparian area management; and public access to public lands.

## MANAGEMENT FRAMEWORK PLAN

The continued reliance of the Bureau of Land Management on obsolete Management Framework Plans (MFP) for management direction ten years after passage of the Federal Land Policy and Management Act (FLPMA) is of great concern to the National Wildlife Federation. This is a problem in both the Carlsbad Resource Area and throughout the public lands administered by the Bureau. The Federal Land Management and Policy Act requires the development of comprehensive land use management plans which conform to FLPMA's requirements. The Bureau's regulations define the land use plans required by FLPMA as Resource Management Plans [1601.0-5(k)]. Reliance upon MFPs can be justified for only a brief transition period [1610.8]. In 1986, ten years after the passage of the Act, a resource management plan for the entire Carlsbad Resource Area is the only legal planning option available to the Bureau under FLPMA and the Bureau's own regulations. In order to correct this deficiency, the Bureau must either issue a new draft RMP for the entire Carlsbad Resource Area, incorporating the lands currently encompassed by the East Eddy/Lea Management Framework Plan, or prepare a separate RMP on the East Eddy/Lea MFP area.

55-1

The BLM is relying on existing MFP's only until this RMP goes into effect. It was scheduled according to the provisions of agreements with NRDC et al. for preparation of EIS's on grazing management.

The Carlsbad RMP does cover the entire Resource Area, as noted in the DEIS in the addressee letter (inside front cover), the Summary opening statement (page S-1, paragraph 1) and Chapter 1 (page 1-3, column 2, LOCATION). Further at 1-3, (PURPOSE AND NEED), the Draft states "The Carlsbad RMP incorporates applicable decisions from these plans."

55-1

# WITHDRAWAL REVIEW

According to the draft RMP, "those withdrawals which are no longer needed for the purpose for which they were withdrawn will be returned to BLM Administration" (p.3-3). Under Section 202 of (FLPMA) (43 U.S.C. §1712 (1982)), all decisions concerning prior withdrawals must be reviewed in the course of developing resource management plans, and can be revoked or modified only if they are consistent with land use planning authorized under the Act. While Appendix B-2 outlines the pending withdrawal review, more details are required as to the original intent of the withdrawals, the current usage of withdrawn lands, and the environmental impacts of the proposed revocations.

55-2

In a similar light, the document acknowledges its objective "to modify and revoke portions of the existing C&MU classifications in the CRA" (p. 3-2). However, no specific information is provided in this RMP as to the location of the lands in question, their current usage, the specific intent of the classification, or most importantly, the environmental impacts of the proposed terminations and modifications.

55-3

Given these facts, the Bureau should provide the public with sufficient information on each proposed withdrawal revocation and classification termination or modification being considered and the opportunity to comment on the proposed action within the context of the Carlsbad RMP as mandated by Section 309 of FLPMA, 43 U.S.C. §1739 (1982).

55-4

In addition, the Bureau must comply with the Order entered by the Federal District Court of the District of Columbia on February 10, 1986 in CA No.85-2238 as follows: the Bureau may not revoke, terminate, or otherwise modify withdrawals and classifications; nor may it take any action inconsistent with the specific restrictions of a withdrawal or classification in

55-2

The Section 202 reference to withdrawal is for BLM administrative withdrawal on public lands [see definition of public lands FLPMA Sec. 103(e)]. Section 202 withdrawals are usually protective withdrawals which segregate an area from certain activities such as mineral leasing or mining laws in order to protect another resource. The withdrawals referred to in Appendix B-2 throughout the RMP are existing withdrawals for other agencies which removes that land from the jurisdiction and administration of the BLM and are, therefore, no longer "public lands" as defined by FLPMA. The withdrawal review program is a separate program which will take years to complete and does not fit into the time frame or design of the planning process. The only DOI administrative withdrawal that is in effect is the protective withdrawal surrounding the exclusive use area for WIPP and is addressed on DEIS page 2-5, first column, last paragraph. The impacts of that legislative withdrawal are discussed in the WIPP EIS.

55-3 & 55-4

Refer to DEIS page 3-2, column 2, paragraphs 2 and 3 regarding the intent of the classifications. Specific information as to location of classified lands is in the East Eddy/Lea, Caverns and Box Canyon MFPS. These documents are available for review in the CRA office. The environmental documentation and public input on the termination of existing classifications will be consistent with the significance of the action. Except for minor acreages, the classifications in the Resource Area are only segregated against agricultural entry and RS2455 sales. Neither of these actions can occur because of laws that were repealed by FLPMA and because all ground waters in the area have been appropriated. No actions which are inconsistent with the intent of any of the classification have or will be taken. The Wildlife Federation lawsuit is still in litigation with the outcome yet to be determined by the courts.



effect on January 1, 1981, including but not limited to the issuance of leases, the sale, exchange, or disposal of land or interests in land, the granting of rights-of-way, or the approval of any plan of operations.

55-4

SPECIAL MANAGEMENT AREA DESIGNATIONS (SMA)

According to Section 202(c)(3) of FLPMA, "...the Secretary...shall give priority to the designation and protection of areas of critical environmental concern in the development and revision of land use plans." According to the draft plan, thirteen areas were nominated for ACEC designation, but only six were judged to meet the criteria of relevance and importance (p.3-20). However, it is clear from data provided in the draft plan that at least three of the rejected areas fulfill the requirements for ACEC designation, as follows:

1) The Los Medanos Raptor Area provides habitat for perhaps the highest density of breeding raptors in North America. In addition, it is the northern most extension of the range of the Harris' Hawk, a very unique raptor specie (p.3-24).

55-5

See response to comment 27-2. The area has been submitted as an ACEC in the FEIS (see FEIS Chapter 2).

2) The prehistoric multicomponent Poco Site is a rare undisturbed stratified site which may contain rare pithouse structures. So unique is the site, that it has been declared eligible for nomination to the National Register of Historic Places (p.3-25).

55-6

While the Poco site meets the criteria for an ACEC designation to some extent, the restrictive management prescriptions under the SMA designation will suffice to protect these resource values. After consideration of the alternatives and given the small acreages involved, it was determined that the SMA delineation was sufficient for adequate site management.

3) The Little McKittrick Draw is one of only two locations where the New Mexico ramshorn snail exists. This state-endangered species is also a candidate for Federal Threatened/Endangered Status (p.3-23).

55-7

An RNA designation is considered better suited than ACEC until further information or research data indicates otherwise.

Each of these areas "present a significant historic, cultural, or scenic value; a fish or wildlife resource or other natural system or process [with] qualities of more than local

significance and special worth, consequence, meaning, distinctiveness, or cause for concern", thereby meeting the criteria of relevance and importance for ACEC designation (43 CFR §1610.7-2). We recommend that the Los Medanos Raptor Area, the Poco Site, and the Little McKittrick Draw receive ACEC designation and that the three other nominated, but not designated areas be re-examined for possible ACEC classification.

In addition to proposed ACECs, the draft plan includes two other SMA designations: Research Natural Areas (RNA) and Special Recreation Management Areas (SRMA). The draft states that "in general, an activity would be allowed [in an SMA] as long as it does not interfere with the management objectives for the area"(p. E-1). Appendix E presents the recommended management policies for each designated area. However, a comparison of the special area descriptions in Chapter 3 of the draft with the management prescriptions in Appendix E brings to light numerous discrepancies. In most instances, the rationale in Appendix E fails to elaborate on the differences in the amount of acreage covered by special stipulations, closures, or other protective measures. The following three examples illustrate the problem:

The Yeso Hills ACEC/RNA, a 5,460-acre area which supports a variety of unique gypsophils within the Chihuahuan Desert ecosystem (p.3-23), would receive closure to leasable minerals, be withdrawn from locatable minerals, and have NSO stipulations applied on less than 20% of its acreage under proposed alternative C. On the other hand, Alternative D states that "acreage designated ... would be expanded to the full 5,460 acres". No explanation or rationale is offered for the difference in management prescriptions considered for alternatives C and D, or why the Bureau has selected alternative C as its "preferred" alternative (p.E-37).

55-8

The Yeso Hills SMA has been changed as described in the FEIS Chapter 2 and Appendix E map. The RNA would be used to investigate ecological systems without the interruptions of surface disturbance from minerals industry or vehicle use. Comparative investigations can be made on ecological systems within disturbed areas outside the RNA.

55-8



The Pecos River/Canyons Complex ACEC/RNA consists of two large distinctive limestone and sandstone canyons containing: unique riparian habitat not elsewhere evident in the desert grassland of southeastern New Mexico; complex archaeological sites; distinctive and unspoiled scenic values; and prime wildlife habitat for several endangered species (p.3-25). However, the management prescription proposed in the draft plan fails to provide total protection from oil and gas development or leasable and locatable mineral extraction. The BLM provides no rationale for the different management prescriptions proposed under alternatives C and D (p.E-65).

55-9

55-9

Drilling operations on adjacent mesa tops would not affect the proposed RNA. The most scenic portions of the SMA include the two canyons themselves which are cut into the surrounding plain. On the plain between the two canyons there is presently one producing natural gas well and one which is shut in until production transportation pipelines are developed. The two federal leases involved are held by production. Alternative C accommodates surface disturbing activities associated with oil and gas exploration and development. Under Alternative D, existing activities associated with these two leases could not be altered.

The Chosa Draw Caves Complex ACEC/SRMA is described as a very important component in regional hydrology and habitat for State listed fish species" (p. 3-20). However, oil and gas NSO stipulations and withdrawal from locatable minerals is proposed under alternative C on only half of its acreage. Furthermore, there are no restrictions on livestock grazing. However, alternative D would maximize "protection of cave resources and lessen contamination of the sensitive hydrologic ecosystem" (p.E-11). The rationale once again fails to explain why this alternative was not chosen.

55-10

55-10

Under Alternative C, important cave resources protection would be enhanced by designing careful placement of certain mineral exploration and development activities within and near the boundaries of the SMA. Under Alternative D, cave resource protection is maximized by restricting any surface/subsurface disturbances further from the complex cave systems.

Under the preferred alternative, the protection afforded these special resource values is inadequate. Therefore, we propose that all SMAs, especially ACECs, be managed under the prescriptions of Alternative D to be afforded maximum protection from commodity development.

#### OIL AND GAS LEASING AND DEVELOPMENT

With respect to the Draft Plan's treatment of oil and gas leasing and development within the Resource Area, we have the

following comments:

1) Oil and gas leasing and development considerations dominate all other resource values. This is indicated by the plan's assertion that "all lands in the Federal mineral estate are open to oil and gas leasing except for 11,680 acres of withdrawals" (p.3-4). This ignores FLPMA's mandate that:

... management [of the public lands] be on the basis of multiple use and sustained yield unless otherwise specified by law...

and that

...the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use...[43 U.S.C. §1701 (a)(8)]

Clearly the Bureau's announced intention of providing for virtually all lands within the resource area to remain available for oil and gas development, while affording non-commodity resources only minimal consideration, is contrary to the law's intent.

2) The document relies heavily on "no surface occupancy stipulations" (NSOs) to minimize environmental disturbance and protect critical resources. The Bureau's broad reliance on NSO stipulations for the the relatively small acreage proposed for any protection (23 special management areas totaling 44,007 acres, p. 4-26) do not fulfill the Bureau's obligation under FLPMA and the Endangered Species Act to protect wildlife and

55-11

Although all levels in the Federal mineral estate are open to oil and gas leasing (except withdrawals) they are also managed for multiple-use according to applicable law, regulation and policy. The proposed RMP would decrease the federal mineral estate open to oil and gas leasing with standard stipulations from the present 2,314,834 acres to 2,117,732 acres. This represents increases of 39,797 acres with "No Surface Occupancy" Stipulations, 98,290 acres with seasonal "no drilling" stipulations and 240,202 acres with special surface disturbance and reclamation stipulations. It should be noted that the standard stipulations which apply to the remaining 78 percent of the federal mineral estate provide adequate protection for the affected multiple resource values.

The Bureau's intention is to balance resource utilization with conservation, to resolve competing or conflicting land uses and to promote substantial productivity and multiple use in accordance with applicable laws, regulations, manuals, Executive Orders, Secretarial Orders, existing planning documents and other instruction, policies and guidance.

55-12

The RMP proposed NSO stipulations to prevent surface occupancy for oil and gas development. The areas proposed for NSO stipulation are not only protected by that stipulation but by a variety of other protective measures restricting potentially damaging uses of many types. Refer to Chapter 2 in this FEIS or to the DEIS, Appendix E for management of wildlife habitats with or without NSO stipulations.

An RMP decision to attach the NSO stipulation to new leases would not be terminated "easily...and away from public scrutiny and participation," but would require a plan amendment with public involvement.

Most of the Carlsbad Resource Area is already leased for oil and gas. Removal of areas from leasing would generally contradict Bureau policy. Moreover, with expanding technology, it is impossible to predict the industry's ability to directionally drill. Consequently, NSO was determined to be more appropriate than nonissuance of leases.

55-11

55-12



their habitats. A decision to terminate such stipulations is discretionary with the State Director, can be accomplished easily as a result of pressure from the petroleum industry, and occurs away from public scrutiny and participation in such decisions. Moreover, the Acting Regional Solicitor for the Rocky Mountain Region has concluded that the Department of the Interior "cannot use... [an NSO] stipulation as an instrument to vitiate the inviolable right to drill given the lessee by the Mineral Leasing Act." (Memorandum from the U.S. Department of the Interior, Office of the Solicitor, Acting Regional Solicitor, Rocky Mountain Region, to John Matis, U.S. Geological Survey, October 10, 1980, p. 25) It is therefore a sham for the Bureau to assert that critical environmental resources such as wildlife and wildlife habitats or other important environmental values can be effectively protected from the adverse effects of oil and gas development via reliance on NSO stipulations.

55-12

The reliance upon NSO restrictions should be carefully reconsidered for another reason: if such areas are too large to accommodate directional drilling, leases should not be issued.

The Carlsbad Resource Area BLM staff should note the conclusions of the BLM in the Headwaters Resource Management Plan (Montana):

A rule of thumb is that oil and gas resources over one-half mile from a drill site probably cannot be drained without directional drilling. Directional drilling in structurally complex areas is unproven and we have assumed it is not feasible in our assessment of environmental impacts. Therefore, if no surface occupancy areas are over one-half mile wide, the area more than one-half mile from an occupancy site is not leased, since the feasibility of developing oil and gas from beneath it is poor. In some cases of extreme topography, this distance is reduced to one-quarter mile. (p. 55, Final Headwaters Resource Area RMP/EIS, November 1983, BLM.)

3) The proposed plan mis-applies seasonal restrictions. Seasonal restrictions may be appropriate for mitigating impacts from exploration and limited development activities. However, seasonal restrictions may not be applicable to an operating field which requires continual maintenance. In such cases, such seasonal restrictions may create serious safety hazards. Therefore, seasonal restrictions are of questionable use in mitigating the potential impacts of oil and gas operations. The Plan should identify and propose mitigating measures which will protect wildlife and other natural resources within the Resource Area from the impacts of field development and operations.

55-13

4) The draft plan fails to address the question of managing existing oil and gas leases within the resource area. While the RMP notes that the majority of the Federal mineral estate has been leased (p.3-4), no attention is paid to projecting the future development of these leases, their potential impact upon the environment, the legal authority of the BLM to restrict and mitigate adverse impacts on other resources in the development of these leases, nor are any alternative proposals to implement such restrictions or mitigation measures considered or discussed. In fact, in areas which the Draft RMP otherwise concludes leasing and development should be restricted, no action is proposed for existing leases. For example, the discussion of the Maroon Cliffs states that the entire area is within the Big Eddy Oil and Gas Unit. Therefore, while the plan proposes restricted surface disturbance to protect resource values, it acknowledges that "existing leases will be held by production anywhere within the boundaries and no-surface-occupancy stipulations cannot be added to existing leases in the foreseeable future" (p.3-4).

55-14

In addition, the plan fails to give sufficient attention to reclamation procedures following oil and gas development. This

55-13

Seasonal restrictions in the four SMAs affected are not the only mitigating measures to protect wildlife and other resources. The plan does propose special stipulations to reclaim or prevent surface disturbances. The seasonal restrictions on drilling in the wildlife SMAs are intended to limit drilling during critical nesting and fawning periods. Drilling is proposed to be limited in the Dark Canyon SMA to avoid drilling within view of visitors to Carlsbad Caverns National Park during the heavy use season. Maintenance of existing developments would still be allowed year round to eliminate safety hazards.

55-14

The 1981 Roswell District Environmental Assessment (EA) on oil and gas leasing is incorporated into this FEIS by reference. It details management of existing leases.

The DEIS (page 3-5, Table 3-2) shows that production and the size of new pools has declined, and that this trend will likely continue. BLM cannot project future lease development with available information. This is covered under special stipulations and attached to a new lease. Existing leases cannot have new strips attached unless mandated by law.

BLM is currently conducting experiments to determine the effects of caliche on plant regrowth. Surface disturbance is restricted to the minimum. The 1981 Oil and Gas Leasing EA describes management of existing leases.



important issue becomes exceedingly critical in light of the environment in the Carlsbad Resource Area. For example:

oil and gas wells treated with caliche "rarely regain their former productivity, and potential for rehabilitation is low." (p.3-10)

"the mud pits used for oil and gas drilling contain large concentrations of salts. When these areas are reclaimed, the salts prevent any significant amount of plant growth." (p.3-10)

"once disturbed, these gypsum soils are extremely difficult to revegetate due to their droughtiness and high salt content." (p.3-9)

This information mandates further research on the reclaimability of oil and gas sites in the Carlsbad Resource Area. We recommend that surface disturbance be restricted to an absolute minimum until more successful reclamation techniques can be developed. The RMP should address the management of these existing leases, particularly for the areas which it has concluded that development should be limited or prevented.

55-14

5) The Draft Plan fails to adequately examine and analyze the cumulative adverse impacts from oil and gas development.  
For example, the Draft Plan states that:

"subsurface geologic formations within a KGS are considered as areas of high oil and gas potential. Areas outside a KGS are considered as moderate potential in CRA. These conclusions are based upon data on KGS and oil and gas field locations." (p.3-6)

However, the plan fails to provide any specific information on oil and gas development or any maps of the Carlsbad Resource

55-15

55-15

Specific information on oil and gas development is not required to be published in a Resource Area-wide land use plan. It is on record in the files and was available during the analysis process for planning purposes.

BLM fluid minerals management policies used for multiple use planning requires analysis of:

(1) The potential for fluid minerals occurrence. This was determined using the KGS boundaries to delineate high potential from moderate potential. The Carlsbad Resource Area has no mineral estate of low potential or no potential.



Area outlining existing and potential oil and gas leases. KGS maps, according to the draft plan, are located in the Mineral Resource Assessment for the Carlsbad RMP (p.36). Unfortunately, the RA office acknowledges that this unpublished document is not readily available for public review, and its lengthy nature necessitates a substantial copying charge (conversation with Charles S. Dahlen, Area Manager, 5/30).

With the majority of the Federal mineral estate leased in the Carlsbad Resource Area, habitat deterioration occurs yearly on 2500 acres from oil and gas activities (p.4-9). The document fails to explain how habitat disturbance on leased lands will be curtailed. In addition, the draft plan proposes to reopen previously abandoned wells to new depths on an area-wide basis (p.3-6), but provides no consideration of the potential risk in redrilling, the environmental impacts to areas not currently being disturbed, or the requirements for reclamation.

The draft plan's claim that "assessment of the impacts of all possible oil and gas related actions is beyond the scope of this RMP" (p.4-1) indicates its failure to examine, analyze, and propose effective management actions to mitigate the cumulative adverse impacts of oil and gas development. A cumulative assessment of the impacts of all potential oil and gas development activities is required because subsequent to leasing decisions, there are no opportunities to examine the impacts which may have substantial adverse effects on wildlife. Furthermore, the National Environmental Policy Act, 42 U.S.C. §4321 et seq., requires the preparation of an Environmental Impact Statement on this issue:

A central purpose of an EIS is to force the consideration of environmental impacts in the decision making process... That purpose requires that the NEPA process be integrated with agency planning at the "earliest possible time,"... and this purpose cannot be

55-15 continued

(2) The potential impacts of fluid minerals development on other resource values. Fluid minerals leasing is proposed to continue except in current withdrawals; however, impacts as described in Chapter 4 of the BEIS should result only in the worst case should accidents occur or mitigating measures and special stipulations fail to prevent damage. As pointed out in Chapter 4 of this FEIS, management prescriptions in the proposed plan would significantly improve sensitive habitat conditions in the Carlsbad Resource Area.

(3) The feasibility of emphasizing less restrictive measures to protect important resource values.

The 2,500-acre habitat loss figure on page 4-9 refers to an average annual surface area estimated to be disturbed by development activity. In most cases, sensitive or significant habitats are avoided when siting well pads, access routes, and pipelines, and over time, disturbed areas are revegetated. This acreage does not represent a constant rate of habitat loss due to oil and gas development, but was used to analyze alternatives where the variables included acres under no surface occupancy and other stipulations that would reduce the rate and total amount of habitat disturbance. The amount of surface acres subject to disturbance will be reduced significantly when the proposed plan is implemented.

Abandoned wells are not being proposed to be reopened by BLM in the Draft RMP. The statement on page 3-6 refers to the possibility for oil and gas lessees or designated operators to reopen their abandoned wells to develop previously uneconomical reserves. It would not normally occur in undisturbed areas, and would be subject to all safety and environmental protection measures required by law, regulation, and applicable lease conditions.

All possible oil and gas-related actions cannot be predicted, either in terms of site-specific locations where they might occur in the future or their timing. Subsequent to leasing (which in itself does not affect environmental components), there are several opportunities to examine potential impacts of related actions on wildlife habitats:

(1) When the application for permit to drill (APU) is filed by the lessee or designated operator a surface use plan is prepared and viewed to assess environmental impacts, a field inspection to determine potential conflicts is conducted, and well locations are authorized only if there would be no unacceptable impacts.

(2) If additional facilities or access roads are needed to develop a field, they can be authorized only if all protective conditions, stipulations, and mitigation measures are incorporated into the proposed actions.

(3) Abandonment of wells, lease relinquishment, and termination of operations requires BLM to prepare a report either accepting rehabilitation as adequate, or rejecting it. Abandonment plans must provide for disturbed soils and other resources to be restored and/or rehabilitated as provided for in the stipulations. A lease bond is terminated only after BLM is satisfied with compliance.



fully served if consideration of cumulative effects of successive, interdependent steps is delayed until the first step has already been taken. (Thomas v. Peterson, No. 84-3887 (9th Cir. Feb. 11, 1985) slip. op. at 6, emphasis added)

55-15

The analysis provided in the Draft Plan clearly fails to meet these obligations, and the BLM should refrain from issuing any new oil and gas leases, or approving any new applications for permits to drill, until such an EIS is completed and approved.

#### LIVESTOCK GRAZING:

The draft plan states that only 12 allotment management plans (AMPs) exist in the Resource Area, covering only 200,000 acres of the 960,000 acres open to livestock grazing. The draft proposes that in the future, 49 "cooperative management plans", instead of AMPs, would be developed covering an additional 213,000 acres. "Cooperative management plans" are defined as follows:

Written plans designed to enhance range condition by improving livestock distribution and providing the proper use and periodic rest of available forage on public land. These plans specify goals and objectives for grazing management and the steps required to attain the desired results on individual allotment. (GL-3)

Although this definition is quite vague, it is apparent that what is being proposed is the implementation of 49 "cooperative management agreements" of the type which have been found illegal in NRDC v. Hodel (Civ.S-84-616 RAR). In that case the Court imposed a permanent injunction on the CWA program, prohibiting the Bureau from implementing the following grazing regulations: (1) the Cooperative Management Agreement Program, 43 C.F.R. §4120.2-3 and 4170.1-4 (1984); (2) the dilution of allotment management plans, 43 C.F.R. §4120.2

55-16

55-16

For all intents and purposes, the terms "cooperative management plans" and "allotment management plans" are synonymous. This is stated in the Bureau of Land Management, New Mexico Rangeland Consultation, Cooperation, and Coordination Policy Section 8, Public Rangelands Improvement Act (P.L. 95-514).

(1984) and the deletion of 43 C.F.R. §4120.2-3(a); (3) the supplemental feeding amendment, 43 C.F.R. §4140.1(a)(3) (1984) and the deletion of 43 C.F.R. §4140.1(a)(3) (1983); (4) the land use planning amendment, 43 C.F.R. §4130.6-3 (1984) and the deletion of 43 C.F.R. §4120.2-1(c) and 4130.2(d)(3) (1984); and (5) the operator penalty amendments, deletion of 43 C.F.R. §4140.1(b)(7) and (8) (1983).

55-16

Because it appears that the so-called "cooperative management plans" referred to in the draft plan are thinly disguised "cooperative management agreements" which the Bureau is enjoined from implementing, this proposal is illegal. The Carlsbad Resource Area will have to develop and implement AMPs instead.

Of equal concern to the National Wildlife Federation is the current rangeland condition and the potential for rehabilitation under the preferred alternative. According to the RMP, roughly 56% of the CRA grazing area is in fair or poor condition (p.3-14). Despite this data, the BLM plans to increase the forage usage from 192,000 to 225,000 AUM on a long-term basis. "The projected increase in livestock forage is dependent on implementing grazing systems, installing rangeland improvements, and establishing vegetation treatments." (p.4-38) By the BLM's admission, several factors indicate that this reliance is ill-founded:

"several of the existing AMPs still require substantial rangeland improvements before they will be fully implemented." (p.3-15)

"less opportunity in this alternative [exists] to increase cover by vegetative treatments and, consequently, reduce soil loss" (p.4-28)

"fewer sites would be converted from poor to fair condition and from fair to good condition" (p.4-28)

55-17

Approximately 24 percent of the grazing area west of the Pecos River is in fair or poor condition. Through the implementation of intensive grazing management, i.e., grazing systems, rangeland facilities, and vegetation treatments (see DEIS page 4-29), ecological vegetation condition and available forage are projected to increase on those allotments under intensive management. The figure for vegetation treatments under Alternative C shown on page 2-40 of the DEIS is incorrect. It should be 62,000 acres and has been changed in FEIS Chapter 2, Additions and Corrections to the Draft.

55-17



It is also disappointing that under the preferred alternative (alternative C), "loss of soil productivity, increasing erosion, and sedimentation would continue to occur over most of the CRA." (p. S-10) It is further disappointing that insofar as wildlife and wildlife habitat condition is concerned, the draft plan acknowledges that there is virtually no difference in management prescriptions between alternative B, "emphasis on production and consumption of resources", and alternative C, the so-called "balanced" approach to resource management (p. S-10). In light of this information, we recommend implementation of "a rangeland management program ...to reduce livestock grazing where necessary to benefit watershed, wildlife, aesthetics, and other multiple-resource uses" (p.2-44) as is proposed in Alternative D.

55-18

55-18

Management prescriptions in the document are broad guidelines and suggested practices. Each area and situation will require a variety of management schemes with a holistic approach. Acreages do not significantly change between Alternatives B, C, and D, because this area is necessary for specific wildlife priorities. Prescriptions and acres greatly change between alternatives when range, watershed, recreation, realty, and mineral aspects directly affect wildlife. Wildlife management is inseparable from any of the other multiple uses as outlined in FLPMA.

Another obvious failure of the RMP is the denial of the opportunity to comment on grazing management for the public lands east of the Pecos. Reliance on the East Roswell Grazing Environmental Impact Statement (BLM 1979), not only poses an additional complication for reviewers of the RMP, but may also be considered inadequate documentation. Significant time has elapsed since the preparation of this EIS, while new research has occurred and new biological information is available regarding livestock grazing management practices. According to the National Environmental Policy Act, "if significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts [occurs], the agency shall prepare supplements to either draft or final environmental impact statements." (40 C.F.R. §1502.8 (c)(1)) We recommend that a supplemental EIS be prepared, or at a minimum, a determination of the validity of the EIS should be presented to comply with the directives of NEPA.

55-19

55-19

The East Roswell Grazing EIS (1979) has been reviewed and the decisions contained therein are considered to be current and valid.

#### TERRESTRIAL HABITAT ANALYSIS/MANAGEMENT

In response to the proposed management alternative, our

55-20

primary concern is the obvious lack of surveys and therefore, information on which the plan is supposedly based. By the BLM's own admission, "additional surveys and restrictive stipulations would protect and significantly improve T&E habitat conditions" (p. 4-30). And as in the case of livestock grazing, all wildlife management decisions east of the Pecos River are based on information from the East Roswell Grazing EIS. As discussed previously, the validity of the BLM's reliance on this document should be substantiated.

55-20

See response to comment 55-19. Existing rangeland monitoring studies are available and will be used in part to monitor wildlife habitat conditions.

55-21

Our concern for protection of wildlife habitat is heightened in the San Simon Swale Pronghorn Habitat Area. According to the RMP, "pronghorn antelope habitat is in fair condition with a stable trend" on a resource-wide basis (p. 3-16). Although the San Simon Swale Area is recognized as a SMA, the plan proposes to remove seasonal stipulations on oil and gas drilling along with opening the area to goat and sheep grazing (p. E-55). This nearly total relaxation of the protection of this habitat jeopardizes the stability of the herd. Due to the significance of this change in management, consultation with the New Mexico Department of Game and Fish is mandated by FLPMA [43 U.S.C. §1712(c)(9)]. Despite the plan's contention that the ownership pattern prevents effective management, the rationale fails to substantiate any harm that will occur if the current stipulations remain intact. Therefore, we propose the implementation of Alternative D for the San Simon Swale Pronghorn Habitat or at a minimum, continued management under Alternative A.

55-21

Lack of surface control, existing poaching pressure, and private or state surface land management conflicts which encompasses 75% of the surface area negates the effectiveness of existing "prescribed stipulations."

In summary, we find the available information on wildlife habitat totally insufficient on which to base a long-term management plan. We note again that the Bureau's lack of interest in providing sufficient food and habitat for fish and wildlife, as is required under Section 102(a)(8) of FLPMA, is evident in the draft plan's admission that, "Prescriptions and acreages for HMPs on springs, riparian, and pseudoriparian habitats would be the same as Alternative B" (p. S-10). At a



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In summary, we find the available information on wildlife habitat totally insufficient on which to base a long-term management plan. We note again that the Bureau's lack of interest in providing sufficient food and habitat for fish and wildlife, as is required under Section 102(a)(8) of FLPMA, is evident in the draft plan's admission that, "Prescriptions and acreages for HMPs on springs, riparian, and pseudoriparian habitats would be the same as Alternative B" (p. S-10). At a

the resource area. Riparian areas east of the Pecos are not covered in the draft plan.

Given the fact that threatened or endangered species which occur on the Resource Area are dependent to at least some extent on riparian habitat, and that numerous other fish and wildlife species within the Resource Area rely upon riparian/aquatic habitat for all or a portion of their life cycle, the monitoring, rehabilitation, and proper management of this habitat type should be of the highest priority.

55-22

We propose that the following steps be taken to correct this severe management deficiency: (1) preparation of a comprehensive inventory of the extent and condition of all riparian areas within the resource area, followed by (2) determination of management proposals for these areas, and (3) the implementation of such plans and the continued monitoring of riparian area status.

55-22

We recognized the priority of aquatic and riparian habitat, and are currently conducting inventories of all of these areas on public lands. Management outlines with goals and objectives will be formed and implemented in a riparian or springs HMP.

#### THREATENED AND ENDANGERED SPECIES

The Endangered Species Act expressly imposes on federal agencies a mandatory duty to "conserve" endangered species and their habitat. In turn the terms "conserve" and "conservation" are defined by the Act to mean:

to use and the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this [Act] are no longer necessary.[16 U.S.C. 1532 (3)]

55-23

According to the Appendix D, the Carlsbad Resource Area contains habitat for 6 rare plant species and 5 rare animal species from the Federally endangered list. However, the preferred alternative discusses implementation of recovery plans for only two of these species: gypsum wild buckwheat and

55-23

The Endangered Species Act mandates full protection and enhancement of listed species. We are in the process of collecting additional data and information on all the listed species in the Resource Area and closely coordinate our program with the U.S. Fish and Wildlife Service.



the Pecos gambusia (p.2-30). In Appendix E, summaries of management prescriptions indicate that some or all of the habitat areas for these species will continue to be open to mineral exploration and development. In the preferred alternative, no discussion is presented to substantiate reliance upon the special mineral management stipulations for recovery of the habitat.

55-23

#### ACCESS

We are aware of the continuing problem regarding public access to public lands which exists in the Carlsbad Resource Area, and indeed throughout southeastern New Mexico. It is a problem that has been brought to our attention by our New Mexico members on many occasions, and one which the Bureau will eventually have to resolve to the satisfaction of the public whose lands these are. We are encouraged that the BLM has recognized this severe problem, and has presented in the draft plan the results of its analysis in Appendix F.

However, although Appendix F identifies 10 "high priority" access areas, and 13 "moderate priority" access areas (p. F-2), the preferred alternative identifies only 6 areas where "activity plans would be developed to provide adequate access" (p. 2-42). Furthermore, though the draft plan acknowledges the nature of much of the access problem as county road abandonments, no analysis of how to address this problem is provided.

The Bureau should keep in mind in addressing this issue (which we understand can be quite complex), that Section 205(a) of FLPMA grants the power of eminent domain to the Bureau to obtain access over non-federal lands to public lands. If other methods of acquiring access to public lands of high public interest fail, this authority should be exercised.

55-24

DEIS Appendix F-1 discusses the priority access areas initially identified during the inventory phase followed by a discussion of modifications made at a later stage of planning. The modified priorities discussed in Appendix F-1 are the same as those described in the preferred alternative. The BLM will continue its efforts to retain county road access to public lands and acquire easements on important access routes rather than exercise the power of eminent domain unless all other methods fail and access is critical.

55-24

CONCLUSION:

Given the critical deficiencies of the draft Carlsoad RMP identified above with respect to the continued reliance of a large proportion of the Carlsoad Resource Area on a Management Framework Plan, withdrawal review, oil and gas leasing and development, livestock grazing, and wildlife habitat management, we urge that the recommendations made above be assessed in a revision of this draft, prior to the issuance of a final plan.

JUNE 9, 1986

TO: CHARLES DAHLEN  
AREA MANAGER  
BUREAU OF LAND MANAGEMENT  
CARLSBAD, NEW MEXICO

RE: ESTABLISHMENT OF THE LOS MEDANOS  
RAPTOR AREA

DEAR SIR:

FOR THE PAST 10 WEEKS I HAVE WORKED AS  
A FIELD ASSISTANT FOR JIM BEDNARZ OUT AT  
LOS MEDANOS - I CAME ALL THE WAY FROM  
SAN FRANCISCO TO DO SO. I HAVE STUDIED  
AND WORKED WITH RAPTORS FOR MANY YEARS -  
NEVER HAVE I SEEN AN AREA SO DENSE  
IN BREEDING ACTIVITY. THIS IS TRULY A  
WONDERFUL AND UNIQUE TRACT OF LAND.  
I STRONGLY URGE YOU TO HELP IMPLEMENT  
WITHIN YOUR POWER TO HELP IMPLEMENT  
THE ESTABLISHMENT OF THE PROPOSED  
RAPTOR RESERVE AND ANY NECESSARY  
ACCOMPANYING PROTECTIVE MEASURES.

THANK YOU.

Sincerely,  
Aub C. Freeman  
San Francisco, Calif.





57

## United States Department of the Interior

NATIONAL PARK SERVICE

SOUTHWEST REGION

P.O. Box 728

Santa Fe, New Mexico 87501

IN REPLY REFER TO:

L7619(SWR-PE)

JUN 10 1986

Memorandum

To: Area Manager, Carlsbad Resource Area, Bureau of Land Management,  
Carlsbad, New Mexico

From: Associate Regional Director, Planning and Cultural Resources,  
Southwest Region

Subject: Review of Draft Resource Management Plan/Environmental Impact  
Statement for the Carlsbad Resource Area, Eddy, Lea and Chavez  
Counties, New Mexico (DES 86/10)

We have reviewed the subject document and have the following comments to offer. These comments pertain to those aspects of the plan which could impact Carlsbad Caverns and Guadalupe Mountains National Parks.

Page 3-3. We are pleased to see a statement in the Environmental Impact Statement (EIS) concerning the possible exchange of a 320-acre inholding within Carlsbad Caverns National Park. We are assuming that Bureau of Land Management's (BLM) cooperation and involvement (as authorized in 43 CFR) in Federal interagency land exchanges of this nature would continue regardless of which management alternatives are finally selected in the management plan. If this is the case, we suggest adding a definitive statement to this effect in the "Land Tenure-Disposals" section of Chapter 3.

Page 3-16. We suggest that the EIS include references as to how the numbers "9,100" deer and "200" antelope for West Eddy County and South Chavez County were generated. These references are of particular interest since they form the basis for predicting that a 400 animal increase in deer and a 150 animal increase in antelope would result if alternatives C or D were implemented (pages 4-29 and 4-38, respectively). If these population estimates cannot be supported through appropriate field surveys, we recommend that the use of specific numbers be dropped from the "Affected Environment" and "Environmental Consequences" sections of the EIS since using unreliable data only tends to exacerbate the present confusion concerning wildlife numbers.

Further, while we certainly support the BLM's attention to wildlife habitat management as outlined in Alternatives C and D, we feel that the EIS fails to properly emphasize the continuous turmoil involving deer numbers and deer hunting centering on U.S. Forest Service (USFS) and BLM lands. We recognize the administrative relationship the BLM has with the New Mexico Department of Game and Fish (NMDGF) concerning the management of game species, but would point out

57-1

A definitive statement concerning the possible exchange of the 320-acre inholding within Carlsbad Caverns National Park has been included in Chapter 2 of the FEIS.

57-2

These numbers were acquired through big game surveys conducted by the New Mexico Department of Game and Fish. Total numbers were proportionately ascribed to acreage of public surfaces within the survey area.

57-3

This document expresses the Bureau's concern with improving all wildlife habitat in the CRA. Integration with livestock grazing is conducted at the CMP level for each allotment.

57-1

57-2

57-3

that the BLM still exists as the largest Federal land management agency in the region and, as such, plays an extremely important role in regulating wildlife habitat, and therefore numbers, on lands surrounding Carlsbad Caverns National Park. This is especially important since we assume that a major portion of the Park's deer herd is in reality composed of animals moving back and forth across our mutual boundaries. It is also suspected that the regional deer population has an inextinguishable relationship with grazing management practices on BLM and USFS administered lands. We, therefore, encourage the BLM to insure that the preservation of wildlife habitat is thoroughly integrated into grazing formulas and livestock numbers are adjusted accordingly.

The National Park Service (NPS) encourages the BLM to develop a more active program for assessing the status of deer habitat on the lands they administer in cooperation with the other management agencies. The NPS would also welcome the opportunity to participate in an interagency (BLM, USFS, NMDC&F, Texas Parks and Wildlife, NPS, sportsmen groups, etc.) effort of monitoring wildlife habitat and/or projects involving the censusing of the deer populations.

Page 3-20. As always, the NPS is concerned about the integrity of its boundaries and possible threats to the national park stemming from activities, especially oil and gas developments, on adjoining lands. We are therefore pleased to see the BLM present management alternatives which propose a program for identifying and managing Special Management Areas (SMA) where the preservation of natural and cultural resources, including scenic (visual) resources, are given special attention. Obviously, SMA No.'s 2 (d & g), 4, 5, and 20 are of particular concern to us since they essentially surround a major portion of Carlsbad Caverns National Park. We strongly support the final designation of the above four units as Areas of Critical Environmental Concern (ACEC) and recommend that the BLM take whatever action is appropriate to prevent, or mitigate, degradation of their units by multiple use activities.

In the case of SMA #5, Lonesome Ridge, the National Park Service has in the past recommended the designation of a 3,426-acre portion (Lonesome Ridge WSA, NW-060-801/817) of the SMA as wilderness, and we continue our support of this recommendation.

However, we note that Map No. 305 indicates that the Lonesome Ridge SMA is classed only as a Class II visual resource management area. We question why this area was not classed as a Class I area since it is variously described throughout this document as: an area having "a high (Class A) scenic quality rating, and a high level of visual sensitivity," a SMA, an Outstanding Natural Resource (area), an ACEC, and is currently under consideration for wilderness designation in the USFS Lincoln National Forest Proposed Plan (FR 85/1071). It would also seem that the SMA would qualify as a Class I area by virtue of its existence as a "Classified Special Area," i.e., a wilderness study area.

This map depicts the present (Alternative A) visual resource management (VRM) classes, with the Lonesome Ridge Wilderness Study Area within a VRM class II area in order to meet guidelines of the Interim Management Policy (IMP) and Guidelines for Lands Under Wilderness Review (Dec., 1979, as revised). Under Alternatives B, C, and D (see Appendix E, page E-21 of draft RMP/EIS document) the majority, if not all, of the Lonesome Ridge SMA would be managed with a designated VRM class I, in order to meet management objectives of the SMA.



Page 3-29, Visual Resources. We generally support the visual resources management proposals described in Alternatives C and D since these alternatives offer the most stringent protection of these lands. Our concern is obviously based upon the geographic proximity of the Dark Canyon ACEC and Guadalupe Escarpment Scenic Area in relation to Carlsbad Caverns National Park.

We also request that the Class II visual resource management zone currently encompassing SWA's No. 2 (d & g) and 4 be extended eastward, one section width, along the northern boundary of Carlsbad Caverns National Park to approximately T24S, R25E, Section 22. We feel the extension of this zone is needed to mitigate oil and gas drilling activity on lands along the northern horizon which are visible from the visitor center area within the park.

Based upon our assessment of potential environmental impacts to the national parks and other factors influencing the management of these units, we support Alternative C in the EIS.

We appreciate the spirit of cooperation the BLM has demonstrated in preparing the Carlsbad Resource Area Management Plan and wish you well in your planning efforts.

*Edwin D. Royer*

57-5

An interdisciplinary visual resource evaluation team determined that these areas meet criteria for VRM class III but not VRM class II. Personnel from the National Park Service were members of this evaluation team.

57-5

58

*VII*  
**Eagle-Creek Ranch**  
 Box 2  
 elope, New Mexico 88250  
 505-484-3404

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 ROSWELL

*Lloyd & Norma*  
**Hackler**

June 9, 1986

Mr. Francis Cherry  
 District Manager  
 Roswell - BLM  
 P. O. Box 1397  
 Roswell, New Mexico 88201

Dear Mr. Cherry:

I am sorry to have missed the public hearings on the Carlsbad Resource Management Plan, but I would like to comment for the record on the plan. My land lies in both Chaves and Eddy counties.

The plan, as proposed, seems to me to be well ordered, and well planned to meet the goals of proper use of the federal lands entrusted to those of us who lease it for grazing. It has been brought to my attention that there is an allotment permittee who seeks to transfer the Southwest Chaves County land now administered by the Carlsbad Resource area to the Roswell Resource area. I oppose that recommendation as adding to the burden of most of us in the area.

The suggestion to change administration involves all or parts of some 50 ranches of almost 280,000 acres of federal land with more than 84,000 ADM's of Federal grazing preference.

As the two area administrations now exist, there is basic equality in funding for personnel and basic equality in grazing fee receipts. If the suggested change to move Southwest Chaves land to the Roswell Resource area is approved, the receipts of the Roswell area increase by the same amount. This would create a disparity in personnel for planning and administering range improvement and the other programs. That would work an undue hardship on the lands remaining in the Carlsbad area. The suggestion for change is based on the argument of convenience of location to do business. I find that a weak argument, since practically all of my business (and I assume most of the other operators also) with the BLM is either by mail or phone, or on

Mr. Francis Cherry  
 June 9, 1986

Page 2

the ranch in person with BLM personnel. I have yet to set foot in the Carlsbad BLM office, and feel I have full and complete communication with the manager and, indeed, all the personnel with whom I need to communicate.

I have found the personnel to be firm in their insistence that we operate in accordance with the law and BLM regulations. Even when we have differences, I find them fair and evenhanded. I see no sound argument for changing the administrative boundaries, and I see a very sound argument for maintaining equity in the resource areas. As once stated by someone wiser than me: "If it ain't broke, don't fix it." That fits this case.

Sincerely,

*Lloyd Hackler*  
 Lloyd Hackler

LH:asl



## PUBLIC HEARING PARTICIPANTS

### 2 p.m. Meeting

Leonard Trout (ARCO) T-1 - T-4  
Darwin Van de Grauff (New Mexico Oil and Gas Association) T-5 - T-7  
Joe Ramey (Mobil)  
Tim Jennings (State Senator) T-8  
Hugh Ingram (Conoco) T-9  
Jesse Rayroux T-10 - T-13  
Jim Walters (National Park Service) T-14 - T-15  
Mike Hanagan (Hanagan Petroleum) T-16 - T-17  
Joe King (Texaco) T-18 - T-22  
Doris Fine T-23  
Curtis Doyle T-24 - T-25

### 7 p.m. Meeting

James Witt  
Tom Thornton T-26 - T-34  
Tim Cochran (Desert Rough Riders) T-35  
Curtis Doyle T-36 - T-42  
Debbie Hughes T-43 - T-44  
Carl George T-45 - T-47  
Marvin Watts (State Senator) T-48  
John White  
Tom Vining  
Bob Auld (Desert Rough Riders)  
Walter Biedelle  
J. Ellis Davidson T-49 - T-51

L. L. Trout

Mr. Chariman, my name is Leonard Trout, and I am the Environmental Supervisor for the Central District of ARCO Oil & Gas Company, which is a subsidiary of Atlantic Richfield. I have responsibility in the environmental compliance of ARCO's oil and gas operations and production activities in the Carlsbad Resource Area. I appreciate this opportunity to provide ARCO's comments on the Draft EIS, and Resource Management Plan. ARCO views with concern a number of the suggested revisions to the present management plan, which is referenced as Alternative A. Justification for altering the present plan is technically unsupported in the draft document. Without a technical assessment of the deficiencies of the current management plan, there is no criteria for determining whether a change in management plans is necessary or even beneficial. Changing the existing plan could well be fixing something which isn't broken. We highly recommend expansion of the technical discussion of the deficiencies of the existing plan before the Bureau of Land Management proceeds with any revision.

A second concern with the document is the use of relatively strong definitive statements without reference or technical justification. These statements often use some vague wordings without quantification and are then used without justification for altering the management plan. Let me provide you with a case in point.

On page 4-3 the author states, "improvement of habitat quality will increase animal health and numbers within the affected eco-system. Deterioration of habitat quality will decrease wildlife health overall within the affected eco-system". There is no amplification of the statement. While on the surface the statement seems so obvious as to require no explanation, when in fact, the eco-system can be very flexible in noncritical parameters. The statements are true, only if the limiting portion of the habitat is improved or deteriorated. The authors utilize the concept to limit drilling in raptor habitat to three months of the year, within a quarter of a mile of the nest. While raptor species, including the burrowing owl, a very prevalent species in the area, and since we cannot enter an area, drill, or complete a well which would be 12,000 - 15,000 feet in three months, the stipulation



**T-4**

effectively bars drilling to certain zones of interest in the designated habitat. Before the BLM prohibits drilling in raptor habitat, a number of important questions need to be answered. Number 1, why are all raptor species receiving the same degree of protection? Should the burrowing owl be protected with the same diligence as the Swainson Hawk. Number 2, why is the nine months and one-quarter mile established as a criteria for the drilling restrictions? Why not six months and one-eighth of a mile? And most importantly, number 3, what increase or decrease in raptor species populations can be expected if drilling restrictions are expanded, removed or altered, and are these changes statistically significant?

Without technically defensible answers to these questions, any restrictions on drilling must necessarily be arbitrary. ARCO highly encourages the Bureau of Land Management to take no action based on the draft resource management plan until the document can be revised to:

1. Define and assess the deficiencies in the present management plan, and
2. Provide defensible technical justifications which has been subjected, to peer review for any recommended action.

I appreciate the opportunity to present these comments on behalf of ARCO and I'm available to provide any amplification which you may need.

Thank you.

Dave Mari -

Thank you very much Mr. Trout. We appreciate your comments. Does anyone any one of the panel members have any questions?

The next speaker is, I'm sorry, I don't know whether your are male or female, I'll have to say D. Van De Graaff.

D. Van De Graaff - I'm a male.



My name is Darwin Van De Graaff and I'm with the New Mexico Oil and Gas Association. I appreciate the opportunity to be here today and make some brief comments on behalf of the Association, whose members are responsible for about ninety percent of the production of oil and gas in the State of New Mexico.

T-5 We believe that existing laws and regulations adequately protect the environment on all Federal land which is being considered for exploration or development of Energy Resources. It would not be in the national interest to add to the burden of exploration and development by unnecessarily increasing restrictions on the oil and gas industry. Your own research would turn up numerous examples of how oil and gas companies have worked with Federal land managers to solve environmental conflicts during every phase of the developmental process. Too often, governmental decision making is presented in environmental protection and energy production as either/or decisions. Too little recognition is given to our ability to successfully work within the environment while protecting wildlife and the quality of the air, land and water. Those proposing further restrictions on land use would also be asked to specify the failure of existing laws and regulations. We believe that existing statutes adequately analyze and protect the environmental resources. Current laws require extensive environmental studies be made before oil and gas activities can begin and insure against environmental damage once operations have begun. Additional administrative review and/or the imposition of unnecessary restrictions would serve no purpose unless, of course, the purpose is to terminate oil and gas activities.

Therefore, we are concerned when unnecessary restrictions, those going beyond the already safeguards, increase the costs for no real purpose. We are concerned with the attitude with some agency planners who appear flippant, or at the best, cavalier, about no surface occupancy stipulations, which, and I quote from your document, "would largely eliminate shallow wells and increase drilling costs by forty percent". I can tell you that if you increase drilling costs by forty percent, you would also eliminate a lot of oil and gas wells. We are concerned with the lack of a national energy policy, where we have one agency of government telling us we should develop our domestic resources, and another agency of government impeding that development by imposing



T-6

costly restrictions or unreasonable stipulations. When reviewing the alternative plans being suggested for the Carlsbad Resource Area it would be relatively easy to assume that the plan, with restrictions on the fewest number of acres would be the most acceptable to our industry. This is not necessarily true. One can count the acres, but one must also weigh them for their significance. And, just as beauty is in the eye of the beholder, different geologists see different potentials in the same acreage. I cannot tell you for a certainty which acreage is the best for oil and gas development, and neither can your geologists. Experience and logic would indicate that some areas are more probable than others, but in the final analysis, some degree of exploratory testing is needed. Until then we won't know which resources can be developed or which resources might be left undeveloped. Burdensome restrictions discourage exploration and consequently it is possible that large reserves are, in fact, lost. We are acting unwisely when we preempt proper investigations into which resources or reserves we do have. On anything approaching a large scale it would be a national disaster to lose energy reserves through regulatory excesses. Some exploratory testing needs to be done before determinations can be made as to which sites are critical.

T-7

I believe that instead of any of the plans being considered here, a more practical and more reasonable approach would be to do a staged environmental analysis starting with the stipulations needed to protect values at the least issuance stage, followed by detailed environmental analysis on sight specific exploration or development plans submitted by the lessees. This would allow for an orderly investigation of potential areas while protecting environmental values. At the same time, broad brush restrictions would not intimidate the potential developer. Thank you for your attention.

Dave Mari - Thank you for your comments. We do understand, perhaps not as fully as you do, the plight of the oil and gas industry right now and will try to resolve some of these issues.



Dave Mari - The next speaker is Mr. Joe Ramey.

Thank you, gentlemen. I'm Joe Ramey. I'm representing Mobil Producing Texas-New Mexico, Inc. I have a short statement here.

Mobil objects to the withdrawal of public lands from oil and gas development. It is our intention the deepest reserves can be developed and still offer reasonable protection to environmental concerns. The international oil situation has driven down prices to the extent that it is becoming more and more difficult for the domestic industry to survive. Many wells have become uneconomical to produce and many prospects for development cannot be drilled under present economics. Directional drilling is listed as an alternative to no surface occupancy. However, the added expense of directional drilling only increases the number of prospects that will be condemned. Oil and gas reserves that are not developed and that are left in the ground are forever wasted. A continued decline in this nation's oil and gas reserves and producing ability only increases our dependency on imported oil, resulting in an increased balance of payments deficit and further endangering our national security. Mobile urges the Bureau of Land Management to proceed with caution on this action. If it is necessary to choose an option, we would recommend that option which would allow the maximum oil and gas development.

Thank you.

Dave Mari - Thank you, Mr. Ramey.



Dave Mari - The next speaker is Tim Jennings.

I'm Tim Jennings. I'm a State Senator from Chaves County, Roswell. I also have a ranch, the Penasco River Ranch, which is allotment No. 9019 in your impact statement, and I would kinda like to make a few comments on the whole document as I see it and changes that can be made in the system to make the system better for each and every one of us. In the past I have been a County Commissioner; I have been on the Conservation Committee for eight years; I was born in town, raised in town, and went to work at the Ranch in approximately my junior year in highschool, and worked summers there. I ended up taking the ranch over, which has, part or all of it has been in the family, since 1960. Also, I was kind of proud of this document, because I have the only ranch in this document that was rated in "excellent" category. I don't know that there aren't other ranches in that same category, but it was for some unknown reason, I don't know what it is, that I ended up with the only one in an excellent category, and I don't know why, cause I know that there are some other good ranches in there.

One thing I would like to ask is, No. 1, I would like to see Chaves County returned to the Roswell District. Merely because 90 percent of the people in Chaves County, in my opinion, even in the little boot, do their business in Roswell, and Carlsbad is out of the way. I realize that you can't make accommodations for that know. I would like to see Chaves County returned to Chaves County.

As we go along, I would like to see the existing plan, or the status quo, somewhat kept as it is and I would like to see further cooperation. One thing, when we look at wildlife habitat, how many of you all realize that there are like 50,000 deer hunters in two weekends, in the south half of New Mexico. And with the southeast portion that covers from Duncan or Mayhill, southeast, at one time there were eight game wardens that were responsible for overseeing that. And you stop and look at the damage that is done by those hunders. Not to mention the ---- they have some BLM personnel that are now out in the field. However, they are not identified. They should all be in uniform similar to the Forest Service. They should all have badges with their names on it so that if they give authorization to cross deeded land, like in my opinion has happened to us, and people have entered private land, I think someone should be held accountable.



just as the BLM tries to hold me accountable if I post lands inappropriately. They send a dirty letter, in my opinion, it was a very dirty letter, demanding that they are going to cancel your permit because you posted some lands inappropriately. I can send the same letter and demand that any BLM man, person, not cross my deeded land. We don't get anywhere with that kind of cooperation. It doesn't do any of us any good. When you look around at the hunting season in New Mexico, you've got 50,000 hunters out there in two weekends and it's in the rainy season for most of us, from September to January, which our season extends through, in our area you can have up to 5 inches of rain in one weekend. With rainfall you can have an awful lot of snow, and it's not so bad until they start leaving that place in their 40-foot motor home. All they do is leave the damage and destruction from the roads and where is the BLM to fix it. I mean, you grant free access to them, why does the rancher have to turn around and go out and hire a grader and fix all the roads again, and fix the erosion. Not to mention that they spend more money on beer cans and whiskey bottles and we're left to pick up than anyone else does. I really think that in today's time we should go to a unitized hunting system like I believe an awful lot of the other states in the area have. Let's sit down and let everybody pay for the use of this land, it's not free.

**T-8**

Fire Management- when we look at fire management, it's a little thing, but you know how long my ranch would burn before a fire truck from the BLM came from Roswell or Carlsbad? It would take a long time. Why not turn these fire trucks over to the local County fire departments that they have scattered throughout the BLM land. With a little bit of extra work you can buy those guys a little grass truck that will do more good than anything that we can do in town. I also think that if you could get some of your local BLM employees involved in that it would be great for the local area because the BLM people could work in cooperation with the local ranchers.

The last thing I would like to bring up is probably soil and water conservation. In my ranch I have added at least three waterings where each pasture has at least 3 waterings and closer to 4. And I would attribute that more than anything else as to why my ranch is in an excellent category. Supposedly excellent. But it is easier to deal with the Soil Conservation Service than it is the BLM.



It is an area of cooperation. You sit in there and you go in there with the Soil Conservation Service and those folks sit down and together you work out a solution to your problem. And it's pretty simple. If you ever try to deal with the BLM, granted, they like to work with you. But by the time you get access and approval of your whole plan and working, okay, by the time you get it all worked out, you're looking at about 3 years down the road. And that's just more life and destruction on your public land.

And also, I'd just like to say that it's really hard to see the, what projects are really approved by the BLM, other than painting the tanks brown. I really think there is room for improvement if we all just sit down and work together rather than send threatening letters and things in that area.

Thank you.

Dave Mari - Thank you Senator Jennings. You've touched on a number of things, some of which I think we can address in the RMP, and others we can address in other ways. One thing I would like to clarify is that BLM does not have responsibility for wildlife species. We do manage the habitat you talked about, but the game wardens and law enforcement, that's something we have to work with the NM Game and Fish Department.

Jennings - Yes sir, I would agree. But the damage is done by people that you give the access to and by not regulating the access, and that's the only point I'm trying to make. If you look at the ruts left by a motor home, and that's pretty big ruts, and you know, there's room to work and that's what I'm saying. That if we sit down and work together we can get a lot done and it's also kind of frustrating when you look, I have to drive 170 miles to give 5 minutes of comments. So, thank you.



Dave Mari - The next speaker is R. Lane

Mr. Lane declined to comment at this time.

Dave Mari - H. Ingram?

My name Hugh Ingram, and I'm representing Conoco. Conoco would recommend that no change in the Carlsbad Resource Area Management Plan be made at this time, with special limitations possibly on a case-by-case basis. We do not believe there is sufficient evidence of possible detrimental effect on any wildlife as the result of any activity conducted by the oil and gas industry, which would justify any change. Conoco has proven in other areas of the nation that oil and gas operations are compatible with wildlife. For example, in off-shore operations many years ago there was much hue and cry by the fishermen about how we would destroy their fishing beds. They have since learned that tying up to an offshore platform is the best place in the ocean to fish. Likewise, on the Aransas Wildlife Refuge, offshore Texas, Conoco operates extensive oil and gas recovery operations in that area and have coexisted for many years with the whooping crane in cooperation with the Federal Government. The population of the whooping crane has increased significantly, while at the same time Conoco has conducted their operations in a beneficial manner. I could prove to you with film that we have where Federal employees have made statements that the presence of Conoco and their operations on wildlife refuge there has actually enhanced the whooping crane population, as well as some other wildlife such as the atwater prairie chicken. We believe that this is a case where activity can be conducted in a way, and at times they will not interfere with any wildlife development on a case-by-case basis.

I have a letter here, dated in 1983, from the Bureau of Land Management, which indicates to me that the Bureau of Land Management itself believes that we can coexist. This letter, in the interest of time, states in effect, .....that the Bureau of Land Management would like to install some platforms underneath some of our tank walkways for nesting raptors. So that indicates that they themselves believe that nesting raptors can exist where there are oil and gas operations being conducted.

T-9

And concerning the archeological effects, all operators in the oil field obtain an archeological report by a registered archeologist, an inspection of the area before any surface is disturbed on Federal land. I might add that any surface that is disturbed by Conoco is paid for by Conoco because you know who did it and we stand ready to pay for it and I think probably any rancher here today will attest to the fact that we pay generously for any damage that is done to the surface on the ranches where they operate.

Thank you very much.

Dave Mari - Thank you Mr. Ingram. We do value your cooperation.



Dave Mari - The next speaker is J. RayRoux.

My name is Jess RayRoux. I operate a small ranch out west of Carlsbad and my permit No. is 8076 on the map. I just have a few comments I would

T-10

like to make. First off, alternative C, the one that BLM has recommended, they want to make a 24,859 AUM reduction right off the bat. This is a 1,272 head reduction in cattle numbers. I cannot see why there needs to be a reduction made like this, because once a reduction is made it is never restored. This has been the history of the BLM in my life time. There is Alternative D-1, totally unacceptable to the livestock industry. I don't know, I understand why that some of these have been entered and are to be considered but this one is, the livestock industry just cannot live with anything like this.

T-11

T-12

One comment on off-road vehicle use. I think that off-road vehicle use should be restricted to certain designated areas and all other areas be considered off limits to these vehicles because they do so much damage to the vegetation and also the habitat of wildlife. And I have just one question I would like to have answered, and I haven't found any answer yet. And that is access. Just what is considered to be reasonable access? Is it one mile or is it five miles from an established road? Some of these people that come out there on the ranches, they think that they have to drive within each and every draw or section of the ranch and they call that access. There's no reason I don't think to have any roads within one or five miles of a certain area. Especially for hunting. These areas can be walked into.

T-13

The only other comment I have to make is about the oil and gas locations. and pit areas. I think these pit areas should be confined to a smaller area. They're making them too big. They're taking up as many as ten or fifteen acres out of the ranch land to make a location. That is too much. And then, and I can document this with pictures, of an area where they come in and breached a pit before the water has had a chance to evaporate, to be hauled off to suitable injection wells or wherever it's to be disposed of. These pits are breached and the water come out on the ground onto virgin land and anyone that has any dealings with this water that comes out of these

wells will know that that land will be killed forever. There's going to be no more vegetation grow on that soil. This is all the comments that I have and I would like to thank you all for the opportunity.

Dave Mari - Thank you, Mr. RayRoux. We share your frustrations sometimes in trying to deal with the access issue. It's complicated. I don't know if you were here in my opening statements. I covered a number of things so I might have gone over it more quickly than I should have. Alternative D-1, which is the elimination of grazing alternative, is a requirement in this out-of-court settlement we have with the National Resources Defense Council, so it is something that has to be in there.



Dave Mari - The next speaker is Jim Walters.

I'm Jim Walters, Resources Management Specialist, speaking for Superintendent Rick Smith, who couldn't be here today. I have prepared statement that I'd like to read. The NPS appreciates the opportunity to provide comments on the Carlsbad Resource Area Management Plan and EIS, and will file normal comment and response in memorandum to the Bureau of Reclamation through our normal administrative channels. We support the BLM efforts to manage and protect all of the Resources within the Carlsbad area, but we will confine our comments in response to this EIS to those elements of the plan that might impact the Carlsbad Caverns and Guadalupe Mountains National Park.

First of all, we find the plan to be a comprehensive and well written document and it would reflect the complexities of the Carlsbad Resource Area, the myriad of administrative responsibilities that BLM must balance in managing and protecting the resources of this area. We extend our compliments to the BLM staff for the work and development of this plan.

T-14

We are pleased to see a statement in the EIS concerning the possible exchange of a 320-acre inholding within Carlsbad Caverns National Park. We assume that an exchange of this type will proceed regardless of which management alternative is finally selected, but we would suggest that a definitive statement to this affect be added to the document, or that the issue of land "disposal" be added as a parameter for each alternative.

No. 3, it is always the NPS's concern about the integrity of its boundaries and possible threats to the National Park stemming from activities, especially oil and gas developments, on adjoining lands. We are, therefore, pleased to see the BLM present management alternatives which present a program for identifying and managing special management areas with the preservation of the natural cultural resources, including the scenic, meaning visual resources, are given special attention; Obviously SMA's 2, 4, 5, and 20's are of concern to us since they essentially surround Carlsbad Caverns National Park.

No. 4, we support the BLM's attention to wildlife habitat management within the EIS but feel the document avoids a continuous turmoil involving deer management in and around the Guadalupe Escarpment. While we recognize the administrative relationship the BLM has with the NM Dept. of Game and Fish, the BLM still exists as the largest land management agency within the Region

**T-15**

and as such, plays a critical role in the ecology of all wildlife occupying its land. But it is the deer and mountain lion which occupy the most public attention. We suggest that BLM needs to take a much more active role in the issue of deer management, along with NM Dept. of Game and Fish, the National Park Service, the U.S. Forest Service, and other interested parties in population monitoring and in habitat monitoring. We feel this effort should be a fundamental part of the Carlsbad Area Resources Management Plan. It is our hope that all agencies can develop a comprehensive and cooperative effort in addressing this sensitive issue.

In closing, we would once again like to extend our thanks to the staff of the BLM for the cooperation they've extended to the staff of the National Park Service. We wish you well in your efforts to manage and protect our Country's resources.

Dave Mari - Thank you, Mr. Walters.



Dave Mari - The next speaker is Mike Hanagan.

\_\_\_\_\_, representing Hanagan Petroleum in Roswell, NM

We're a small producer of oil and gas and appreciate the opportunity to comment on the proposed RMP and I hope that the comments given here today do not fall on deaf ears.

T-16 This proposed RMP/EIS continues to show the BLM's blatant over-management of our Federal lands. The proposed RMP exhibits no consideration for the largest land users and employers in southeastern New Mexico. This RMP is aimed directly at the hearts of the ranchers, miners, and oil men of this area. Current regulations are already considered too harsh by members of these industries, and unfortunately, in this proposal they're even more punitive as proposed. Acreage with new and additional stipulations would not increase by just 10 or 20 percent, but would increase by 65 percent. Additional acreage with no surface occupancy stipulations attached would increase by 250 percent in Alternative B and 1255 percent in Alternative D. Acreage with new seasonal drilling stipulations would be increased over 5 times more than the present 25,000 acres. The Resource Management Plan supposedly offers 4 Alternatives. Alternative A is current policy and the Draft states that this Alternative is not a viable Alternative since Alternative B is the minimal acceptable alternative. Alternative B is said to be production oriented according to BLM, however, as discussed earlier Alternative B is already actually far worse than the present policy.

T-17 Skipping to Alternative D, this alternative is supposedly resource protective. This should be \_\_\_\_\_ the environmentalist point of view. Alternative C is the BLM's preferred alternative. It is supposedly some kind of compromise between Alternative B and D. This cannot be further from the truth.

In regard to the affects on the oil and gas industry, Alternative C and D are identical with 74 percent of the time, in SMA's. The remaining 25 percent is heavily weighted toward Alternative B. This is no where near a compromise.

(continued next page)

Alternative C would apply additional stipulations to another 367,522 acres that already have special stipulations on them to somewhere around 500 something thousand acres. This shows that Alternative C is hardly a compromise alternative and clearly shows the BLM's preferred direction in management of our lands. BLM needs to get together with Industries of this area and work with them and not against them. I believe that many companies in the Industry Association would be overjoyed to have the opportunity to work with you on this draft.

In conclusion, at a time when the three major industries of southeastern New Mexico are on the brink of disaster, increased government interference is not beneficial to any party involved.

Thank you for the opportunity to comment.

David Mari - Thank you, Mr. Hanagan. We appreciate your coming down from Roswell and we appreciate your attendance at our Advisory Council meeting.



David Mari - The next speaker is Joe King

We are the largest producer in the State of New Mexico of oil and one of the largest gas producers. We are extremely interested in this document and rather than repeating many of the comments that other members of industry have already brought to your attention, I would like to briefly outline the four major shortfalls that we see in the document.

We do realize that it was a major effort on the part of BLM and it was a commendable effort, but there are some shortcomings, particularly unique to our industry that you should be aware of.

One of the main shortfalls is that the multiple use management as prescribed in the Policy and Management Act of 1976 has not been properly addressed.

**T-18**

Specifically, the value of oil and gas as a natural resource has not received equitable treatment. Secondly, the national policy regarding this country's reliance on imported oil and gas by ensuring that continued development of the energy resources is not being furthered by this document in proposed management. We would be much more dependent on imported oil with it than we are right now.

**T-19**

Thirdly, the early notice and planning requirements of the Act, we feel have not been properly addressed. The planning activities were inadequate to allow meaningful participation in the planning process by the oil and gas industry.

**T-20**

Fourthly, we feel that the Draft RMP fails to assess both the true economic impact of each alternative on the oil and gas drilling and production industry and a result of the impacts on the local and State economies. There are numerous examples that have already been mentioned that I won't go over.

**T-21**

I would like to point out again some of the extreme shortfalls of the raptor area. The statement in there that trees of 3 meters in height will not be destroyed. There's thousands of acres in this roughly 90,000 acres area where you could not place a drilling location in there without cutting down a mesquite tree, and most mesquite trees are nine feet high.

The time window that has been mentioned earlier, which only 3 months drilling will not allow you to reach the 12-15,000 foot depth interval that is the



primary objective today. I would like to address one more issue that has not been properly addressed regarding the value of the oil and gas industry as a resource and it's impact on the local income and State revenues. Contained in the functions of the impact analysis within the report are two statements that we feel are very pertinent. One is that the overall rate of oil and gas development will continue at or near the present level. Any person in the industry in here can tell you that that is absolutely untrue. Another stating that the price of oil and natural gas will not experience any major changes in price, that's absolutely untrue, and not properly addressing, again, the value of the oil and gas resource in southeast New Mexico. We should at least receive equitable treatment.

There's some things unique to this, pertinent to it, recently published estimates made by the Federal Reserve Board in Dallas, for instance, indicate that 10 percent decline in real oil price yields approximately a 10 percent decline in employment in the oil field machinery and the oil field extraction segment. It is evident that the decreases in oil prices translate directly into decreases in net profits. Likewise, higher operating and development costs also result in a decrease in these net profits. In today's economy it is reasonable to expect a very clear relationship between increases in net profits due to stricter regulations as proposed in this program and the reductions in oil and gas production. The economic impact of the various alternatives must be considered anew in view of the significant changes in oil and gas drilling and production the industry is currently facing, and is likely to face in the foreseeable future. For these reasons we feel that the draft RMP/EIS report should be revised to take into account the recommendations presented herein by the other members. I would like to put this in a little bit of real life example. Going back to the raptor area again, in a very severe economic environment, if you are unable to drill in the most significant part of prospective structures because you can't move a mesquite tree or there may be an active raptor nest, which would again maybe include a burrowing owl nest, in our economic climate today the structure could probably not be drilled if you couldn't drill where you feel the most highly prospective part of that structure would exist. Such restrictions could have severe economic impact throughout New Mexico and particularly in this Carlsbad area if this type of thinking pertains to actions. Thank you very much, and I appreciate it.



Dave Mari - Thank you very much. The next speaker is T. Vining.

Mr. Vining - I'll pass.

Dave Mari - Curtis Doyle?

Mr. Doyle - I'll pass at this time.

Dave Mari - Mr. Lane, did you wish another chance at this time?

Mr. Lane - I'll pass.

Dave Mari - I have a few more names here. Betty Denton?

Ms. Denton - I'll pass at this time.

Dave Mari - Perry Denton?

Mr. Denton - I'll also pass at this time.

Dave Mari - The last person on the list is John White.

Mr. White - I think I'll pass at this time.

Dave Mari - That's all of the names that I have that had indicated a desire to make a statement. Is there anybody else who would like to present some comments or views to us at this time?

\_\_\_\_\_, I'd like to, just from right here.

Dave Mari - M'am, this is being recorded and it would be best for us to get your comments from the podium.

**T-23**

I'm Doris Fine, and I represent myself and a little piece of land down in the country, and I'm opposed to the wilderness proposal. I'm only familiar with the Lonesome Ridge proposal and I'm opposed to that because well, I feel like, it is a wilderness. It's well taken care of, you've administered it a long time, and I see no need in listing it a wilderness and making it vulnerable to a Park takeover, which is what it amounts to. And, I'd like to know if this is an extension of HR 1213 or if it's just something that you've come up with. And, anyway that's really the only comment I have to make about it. I would like to discuss it with you and see what your plans are and what a wilderness is. And, I thank you.

Dave Mari - I thank you, and we'd be happy to to discuss wilderness with you at any time. It really isn't an issue within the RMP. It's being addressed on a separate track.

Ms. Fine - Well, it's in the book.

Dave Mari - Are there any other speakers?

I'm Curtis Doyle and I'd like my time at this time.

Dave Mari - Okay.



**T-24**

I'm Curtis Doyle. I'm a rancher, west of town. The think that I would like to bring up to your attention is this nominated potential area of critical environmental concern. The way that I read what you've got in this book is just nothing except a more extensive area of wilderness but that you don't want to call it this. As far as I'm concerned I think that this, all of these areas should be completely left out of the impact statement. There are some areas in there which the main thing you've got is from viewpoints, for scenic \_\_\_\_\_. And you have already got some oil wells started drilling the area, how are you going to get the production

**T-25**

out of that area? You've got some things in here pertaining to wildlife. You state in one statement that the mountain lion population is on the increase. How do you know this? If you know it's on the increase, we'd like to know how did you arrive at this figure, because no one else seems to know.  
Thank you.

Dave Mari - Mr. Doyle, we have a clarifying question.

Pat Kelley - Curtis, are you talking about all the ACEC's or one in particular.

Mr. Doyle - Yes, Sir. All of them.

Pat Kelley - Thank you

Dave Mari - Would anyone else like to make a statement?

I would like to thank the speakers for sharing their comments and views with us and I'd like to thank other members of the audience who took the time to come here, and hope that you will get involved in the process. I appreciate the time you've taken and thank you for focusing in on these issues. Thank you again.

The meeting adjourned at 3:04 p.m.



My name is James Witt, III. I live in Eddy County. I am a rancher, I do not have any BLM permit. I'm just speaking as a citizen of the area. I didn't realize I was going to get to be first, I was going to listen to what people had to say. I am involved, my ranch is involved in the Wilderness Study Area in the Guadalupe, which is Forest Service, so I'm somewhat familiar with some of the arguments. I would urge the BLM to keep in mind that the, this land is public land, it belongs to all the people. You've got to manage it for the rancher, everybody, so don't lose sight of that fact. That's all I'd ask you. As far as the alternatives, I've looked at the, of course there has been plenty of publication in the newspaper, etc. I think you have the power to do a lot of things in these management plans without having to go through Congress, i.e., roads, closures of roads, brush control, protection of archeological sites. I've seen some of the pipelines, where you make them curve around where an Indian built a campfire and we didn't have to have a big nationwide statement on that. So I think you have a lot of powers that you can use without absolutely, totally, closing or making something permanent, say Plan B or something, you can do a lot of things to satisfy a lot of the people from the wilderness spectrum to the rancher, without having to take a more drastic step and adopt say Alternative D, just to protect an archeological site, when I know you have the power to make Transwestern Pipeline curve around where an Indian built a campfire. As far as the alternatives, you mentioned in your opening statement that Alternative C was a balance; my idea of a balance would be like the scales of justice, or the scales you see, that Alternative C would have the equal weight of the population, the people of the United States, and that it would just be equal. I'm not sure that's correct. I think alternate B is probably closer to a balance if you look at the numbers of people. At least the numbers of people who have expressed an interest in these hearings. If you look at Eddy County I'm sure it would be alternate B. We're the area most heavily impacted by what you do in this area, so I question the use of the term balance. I don't really see that Alternative C is a balance when you say that half the people in the United States favor Alternate C. I would urge you to look, and you have input from many groups and numbers, etc. but I think, in my opinion, as a citizen and not a BLM rancher I think Alternate B is probably the closest to a balance that you're going to get. Thank you.

Dave Mari - Thank you, Mr. Witt.

It is very difficult sometimes to try and achieve that balance and the comments that



we are receiving today will certainly help us do that.

The next speaker is Jerry Klipstein.

I would like to refrain right now from any oral comments, but I would like to add that we will have a written comment at a later date.

Mr. Mari - Alright, any written comments, like I say, will be fully considered.

The next speaker is Tom Thornton.

My name is Tom Thornton, past President and Director of the New Mexico Wildlife Federation. We recommend Alternative D, not because it solves all of the problems, but because it seems to do the most for the most people. As my predecessor, Mr. Witt, said, none of the alternatives seem to do, to answer all of the problems. "D", of course, seems to do better for wildlife and recreation, things that I'm most

T-26 interested in. We commend the BLM for its proposal to actually build a recreation site at Red Bluff, although we feel 160 acres is pitifully small area out of 2.2 million acres. I think you ought to give a lot more consideration to recreation not only in the Red Bluff area, but throughout the Carlsbad Resource Area. 160 acres is a really a very small recreation area. Red Bluff is the only decent fishing area that we have in this entire part of the state, and that's not saying a heck of a lot! At times it's good, at times it isn't, but I think it behooves the BLM to keep this in mind and do everything possible to improve the recreation in that area. One of the things, of course, that you could do as you've already included,

T-27 is in the Riparian Habitat improvement. If we could restore the Pecos River to what it was 30 or 40 years ago, we'd have good fishing all the way down the Pecos River, including Red Bluffs. I don't know if that's possible, but it has been done in other areas. This 2.2 million acres serves over 104,000 people, based on your figures. Under recreation and public purpose you list 4 sanitary landfills,

T-28 1 shooting range, 1 motorcross, and 1 correctional facility. I assume that's all the recreation there is. These, of course, are not operated or maintained by BLM, they are private. I would hardly consider a sanitary landfill a recreation anyway. If you can spend a half to a million dollars a year on grazing, and certainly

T-29 I don't begrudge that, we believe you need to spend more than that on range improvement. But if you can spend that kind of money on range improvement we think that you could spend that much and more on recreation. That you should. I see no figures anywhere in your EIS on the amount of money that you intend to spend.

T-30 In Table III-10 you list \$ output by industry in the Carlsbad Resource Area, but you never list recreation, hunting and fishing, hiking, boating, photography, this type of stuff. You never list this as \$ producing, and it does. Dept. of Game and Fish has actual good figures on the value of hunting and fishing and they are tremendous when you know the number of people that utilize this area.



T-31

Under Land Tenure you propose 220,000+ acres for disposal in various ways. The New Mexico Wildlife Federation has continually opposed public land disposal of any sort unless it is in rare cases of exchange where it benefits the public and the land as a whole.

T-32

Under Minerals we recommend that you abandon entirely salt water disposal in earthen pits. There is no way, no way on earth, that you are going to keep salt water out of the aquifer unless you put it in metal or fiberglass tanks. Something other than earthen pits.

T-33

Under Other Solid Minerals, we repeat something that we've been asking, the Wildlife Federation and Carlsbad Sportsman's Club has been asking you to do this for 10 years that I know of, and there are some cases where you are doing it, there are many cases when you are not. That is locate your caliche pit, wire pits, whatever you want to call them, out of site if possible instead of right beside the road and when you finish or abandon those pits, grade them so that they collect water. They are a natural lake if you do that. There are very few that I've ever seen that are graded where they will collect water.

T-34

Vegetation - we're not convinced that spraying and other treatment is the answer to improving the land. We're not convinced that spraying shinnery, for instance, is beneficial to wildlife. In fact, we believe it is not beneficial to wildlife. I'm not sure that it is beneficial to grazing, though you say it is.

Dave Mari - Mr. Thornton, you are touching on a number of extremely valuable points and I hate to cut you off, but your time is expiring. Would you summarize for us?

Mr. Thornton - We urge you to remember that all this land belongs to the public. The public wants access, they want multiple use and they want a voice in the details of management. Thank you.



Dave Mari - the next speaker is Tim Cochran

T-35 I'm Tim Cochran from Hobbs, NM. I'm the President of the Desert Rough Riders, which puts on the Enduro in the ORV projected area. Our club has discussed this and well feel that it would not really be detrimental but we don't feel like it would be in the best interest to call it an ORV area such, an open and publicized area. We have already seen evidence out there of land mis-use on the trail. We try to take care of it all we can and watch for erosion and watch where we run our trail. You all work with us on it and have done a good job. We've been real pleased with the way you all have helped us. But, we feel like if it open to larger vehicles and just any kind of use that comes around, we could end up loosing it for our use also. We'd like to recommend Alternative A, as it is, and keep it in that position, where we can go in on event by event basis, with the land still open and still be able to use it and everybody be able to use it like they want to. But if it is publicized, we feel like then we will run into problems. Not only being selfish, but for the ranchers and anyone else that's using the land the destruction can come about.

Dave Mari - Thanks Mr. Cochran.



Dave Mari - The next speaker is Curtis Doyle.

I'm Curtis Doyle, Queen Route, Carlsbad, NM. I'm opposed to your Alternate Plan C. I think that you need to leave the situation as it is. It don't seem to be too awfully broken but lets not try to change it with some other means. The complaint that I have found in this EIA that I am kind of disturbed about, one is the soil erosion. There seems to be very little emphasis placed on soil erosion. The number of acres that you have go out here in the country, you have got lots of soil erosion, and there doesn't seem to be any solution in this EIS to try to correct this.

T-36

The next think I have is your fence modification. I don't believe that this should be part of the situation and it should not be in there.

T-37

Let me come down to fire management. I believe that a lot of your problems with over growth and brush, lack of grass and \_\_\_\_\_ like this is caused by your fire suppression that you've had in the past. If you'll look around, and so forth, you'll find where they are using brush control methods they are bring back streams, the are bringing back springs, and as Tom Thornton suggested a while ago, this may be a way to restore this Pecos River back to a prime fishing habitat.

I'm not sure what that you mean by access. Part of the situation that I get out of this thing, it means access by a 40-foot motor home, free and easy. And that is just really not, I don't think, what the public really wants.

On page 3-36, Table III-10, this table seems to be very confusing. I read the thing over, I read the footnotes on it, and I still don't understand what you're trying to say.

T-38

And then we get down to your ranch budgets in which you say that this is part of your input-output model. I don't believe that your budgets are prepared in an adequate manner to represent all the income, nor all the expenses incurred on a ranch. It looks to me like that you undeliberatly or deliberately tried to make it show where the least amount of impact to these ranch budgets to prove your point that by doing away with the rancher in situation D-1 does not have any impact.

T-39

Then you get down to your assumptions on page 4-1. You're making this thing a perfect environment. Everything perfect to go along. Then when you get on down there to some of the rest of it you're leaving out the appropriate part of it.

T-40

**T-41** I believe your social and economic conditions on page 4-3 needs a pretty good overhaul. Then you get down to page \_\_\_\_-11, Allotment #8116, the actual  
**T-42** animal units used in that is incorrect. If this is incorrect, how much more of it is incorrect? Thank you.

Dave Mari - Mr. Doyle, I'd like to thank you for your very specific comments. They have been very helpful. We have a question.

Pat Kelley - Curtis, you mentioned the fence modification. Do you know where those are at?

Mr. Doyle - 2-12.

Dave Mari - The next speaker is Debbie Hughes.



My name is Debbie Hughes, my mailing address is 163 Trail Canyon Road, Carlsbad. As a rancher in the Carlsbad Resource Area, I feel that Alternative A, the management now being used, is the only plan that displays common sense. I realize that a lot of time and effort has gone into compiling this document. I'm sure that there may be areas that need to be preserved, but most of the ideas displayed in this RMP directly reflect the Nat'l. Park Service ideas and management policy, in my opinion. I would like for the public to note page 3-3, that refers to a management objective of the Nat'l Park Service. The aquisition of the 320 acres of land by the BLM, which is designated to be exchanged to the Nat'l. Park Service is a perfect example of what will happen to other public lands that are excluded from multiple use purposes. This paragraph states that under 43 Code of the Federal Regulation 2240.0-3f, that this is within a BLM exchange policy. Do we want all of our public land to be Nat'l. Park, with no drilling, no hunting, and no ranching?

**T-43**

Page 4-48 states that under Alternative C grazing permits will be reduced by 12%, but a long-term increase of 15%. There is no way that a small rancher will still be in business when the time comes for the 15% increase. So the BLM will not have to worry about this.

**T-44**

On table 4-6, Impacts from Acquisition, I disagree with the positive aspects stated here. #1 states that improves the resource values of the existing public land. What resources are we referring to? Certainly not oil and gas, or the livestock industry. #2 states public access to important resource values. I feel this will only destroy more public land to give access to more sensitive land areas. #3 eliminates private inholdings. What is the United States of America if not a free country for people to have rights and own property, and not for the government to own it all. The last 2 there, more manageable land patterns and to decrease the administrative costs, I totally disagree with. If the government receives more land it's gonna cost the tax payers more.

In closing, I feel that the document is written so that most people cannot understand it. If it was a little more down to earth I believe you'd have more people commenting. A committee for oil and gas, mining, and ranching should be established to discuss the problems with the RMP before it is decided on. I want to thank you for your time and consideration.



Dave Mari - Thank you Ms. Hughes.

The next speaker is Carl George.

My name is Carl George, I live at 112 N. 9th. I'm a resident of Carlsbad. I'm against all plans of this draft. I do not feel this has addressed this

T-45

wildlife issue. There are areas of other special interests which seem to have favored considerations. I am opposed to the access proposed. I feel we have 100% access now. I do not feel there should be a road every mile to allow road hunt access to all areas. I do not agree with your deer numbers in the areas.

T-46

Map 3-2 shows approximately 80 total deer in the Carlsbad Cavern Park at 10 deer per section. I feel this area of the National Park Service is larger than 8 sections, but I agree, this area is declining in deer population. I totally disagree with all

T-47

assumptions listed under wildlife on page 4-3. On page 3-16 you state the mountain lions are increasing. How many mountain lions are there in this study area? I am opposed to all areas of critical environmental consumption. I feel this is just a back door approach to a wilderness. I feel you could come up with a better plan to take care of this land or just leave it like it is.

Thank you very much.

Dave Mari - Thank you, Mr. George.

The next speaker is Marvin Watts.



Mr. Hearing Officer, members of the panel, my name is Marvin Watts, member of the State Senate, District 34, which is southern Eddy County. Also, I am holding some permits for grazing. I want to commend you on an awful lot of work that went into the Environmental Impact Statement that you've presented, and certainly it's very comprehensive. However, I think that as far as going to additional alternatives I believe that that is unnecessary that we look at other alternatives than what we are doing. Presently what we're doing has been tried, we've been working with it a while and I think that we must start looking at the management capabilities of the BLM, rather than going into regulation and statute for alternatives which restrict production, restrict access, restrict many of the things which are not needing restriction. BLM has been charged with management and I think with cooperative management between BLM and the people concerned, users of the public lands, I think we can make many improvements in those public lands, and certainly we have an awful lot of areas for improvement.

T-48

For instance, I think restriction of the livestock numbers is detrimental to that rancher out there, is going to put that rancher in a difficult management position if he's restricted, and yet when you look through your impact statement most of the area can be improved, actually we could go up probably all over the area with livestock numbers with some improvements due to management. I don't think that we have to go in there and reduce numbers in order to accomplish what we have to do and still stay in business. You know, many of these improvements that we're talking about is water placements, additional water, brush control, and some of these things, some of the improvements that could have been done, probably would have been done, have been restricted in the past in order to finish these impact statements, as you very well know. So, I think BLM management with the plan that we presently have can accomplish these things for everyone. I think that we can go to multiple use, certainly we're all beginning to work with multiple use. I think very much are we working in this area and we've gotten some improvements from BLM in a time of stress in our industries, and you should look at the three industries that we have here, ranching, oil and gas, and potash. They are all stressed and they are all strategic and I think we need to be looking for solutions to some of these problems. You know, if you tied up core drilling, for instance, in maroon cliffs, right now there is nobody out there wanting to core drill in that potash area. But what you're



talking about is your're restricting the largest potash ore body in the United States from being core drilled in case we need that, and we're going to need it. We're producing about 20% of the domestic demand now in potash, they could be up to 30% if it wasn't for the economic conditions at the present time and hopefully some time in the future we're going to need that. It's one of the three strategic minerals needed for plant growth. We're dependent. Already at maximum production here, we're dependent on 70% of it coming from outside the continental United States. Oil and gas is in a similar situation. I think if we start looking at site specific instances, rather than saying certain areas are going to be banned from certain type of activity, I think that we're going to be much more productive on those lands. I think that we can take care of the wildlife. Certainly, you know we've been to the moon, we know how to do an awful lot of things, and certainly we ought to be able to manage these lands to where we can have wildlife; where we can have cattle; where we can have oil and gas drilling; potash production, whatever, productive in those lands. And you know, in this part of the country I think it's very important, because of the public lands that we have here that we work very hard for increased productivity, increased recreation and wildlife on the public land. This has to come from management and I think if we all work together through management, we can accomplish this. It can be done and we don't have to go to restrictions on broad areas of our production. We don't have to restrict it at all. In fact, we need to be looking for other alternatives, I think, as far as production is concerned on the public lands. So, I would urge you to stay with the present plan, to go through management of multiple use, site specific considerations for production and access to the public lands. Thank you very much.

Dave Mari - Thank you, Senator Watts.



Dave Mari - the next speaker is John White

I'm John White \_\_\_\_\_, Carlsbad, and I kind of feel embarrassed to make any kind of a statement after all these knowledgeable people been speaking, but I guess you'll just have to hear what a dummy can say. One thing, about what I'm mainly interested in is this wilderness aspect that they come up with. I can't see how that they can say that it will be any better if it's a wilderness, that you can do more if it's a wilderness. Bureau of Land Management does a real good job, I think, of the way they manage the land, and they have the authority and they can control off road vehicles use, they can control anything on BLM land and the forest Service can do the same thing. It's cost several billion dollar, I wouldn't have any idea how much, to do this wilderness study on this land and if they designated it a wilderness, well it'll cost that much more, and they claim we're short on budget. The United States is short on money. A lot of people may not ever think that, they think that if it's Federal Government, go ahead and spend it, it doesn't make any difference, but the people is the ones who furnish that money for the Federal Government. Federal Government don't make a dime and so that is on wilderness aspect of it. I just don't see that we need any more wilderness around New Mexico, it's one of the biggest wilderness in the United States. Well Alaska's probably bigger but it's not on the continental United States. And, I hear rumor that like on National Park there's some talking about a buffer zone, 10 mile buffer zone. Well that's as far as unconstitutional as I can see anything. It'd be just like as if you had a house down town and you have a 30-foot lawn. Well, the city can come along and say well, you keep 20 feet of this and I'm going to have a 10-foot buffer zone along this edge. Well they got this buffer zone, they can say well, this black-tail prairie dog is gettin to be extinct. We'll bring him in and put him in this 10-foot area. It's already a buffer zone, they've already took that, so they can put him in there and if he gets over in your lawn, that's just tough. I don't know, I haven't really heard any real things on this buffer zone, but that's just one thing I wanted to bring up. I don't see how it can be constitutional at all. I guess that'll do for me for now. Thank you.

Dave Mari - Thank you, Mr. White. I might clarify for you that there won't be any decisions on wilderness which come out of this RMP/EIS. It's a process which is separate from this one.

Mr. White - I didn't figure it would be but there was a comment on wilderness here earlier and I thought you just as well hear my views too. Thank you.



Dave Mari - The next speaker is Tom Vining.

I'm Tom Vining with Carlsbad Sportsman's Club. I want to thank you for listing our organization in your manual with the conservation groups because that is what we are. The bottom line of our organization is conservation. Conservation we classify synonymous with management. It seems like out here you can't consider one without the other. Tom Thornton brought up a point here about the game and Fish Dept., the money that it brings in. I know it probably doesn't qualify up with the big three that's being referred to here. Game and Fish Dept. has a 10 million dollar budget, over 200 employees. They sell 100,000 big game licenses every year. The 100,000 game licenses, that's just the deer licenses, everybody has to have their supplies, the gas, the groceries, etc. to do their hunting. Conservation and hunting go right together. The sportsman in this state pays his own way. The game dept. is funded strictly by license fees, at least 97% by just license fees, and funds that come down through the government, excise tax on sporting and recreation equipment used by sportsmen, so we're not talking tax dollars here. It's not a drain on the economy, it's a boost. It can't do anything except make money and be an economical good booster for the State. The Game and Fish Dept. needs a lot of help in managing and sometimes I think all they're doing now is managing what's left out there, because some of our areas in New Mexico, it's probably not their fault, it's probably not BLM's fault, some of it's mismanaged, some of it's over hunted, various reasons why the game may be depleted. When I'm talking about the game right now, I'm mainly talking deer, elk, antelope, upland game birds are native to New Mexico, not necessarily talking predators. The game and Fish Dept. and all of us need help controlling the predators. They take their share of the game in this state. BLM can assist land holders, and I'm talking about the man that leases the land or owns the land and in your management plans here, as far as wildlife is concerned nothing really fits any of the plans. Some of it's in all of them, some of it's lacking in all of them. If the land holder out here is taken care of so that he can make a living with his life style, he has adequate feed and water to take care of his livestock, the game will be there and he can't help but take care of them. If it's on public land the hunters, sportsmen as such, are going to have access and will have an enjoyable time with their hunts. It all contributes to the state. Wilderness designations will not help. Anything that



limits or diminishes the amount of land that is available in New Mexico, we would oppose, simply from the point of view there is more people. As long as you've got boys and girls, you're going to have more people. You've got a very attractive state here, the climate, as well as the 65 % public land, or whatever it is out here, it's very attractive to our tourist people. The people are going to flock in here. It's a realistic fact that anything that takes away from public access and public lands is going to crowd that many more people up into smaller areas. Therefore, from that point of view we would oppose it. Naturally, there are situations where you're going to have to overcome that, but that fits into your department. If the land holder, like I said, is taken care of, so that he can make a living, then the hunters will also be taken care of, by having game and birds available. All of us can use these public lands, then, keeping good land holder sportsmen relationships. I know that Mr. Jennings was up here and used some good examples of some bad examples today. Litterers, poachers, off-road vehicles that are tearing up the terrain, all of these are legitimate complaints that the landholders have. Here in Carlsbad we are working real hard in educating the people. Our name, Sportsman's Club, implies be a good sport. I thank you for your time.

Dave Mari - Thank you, Mr. Vining.

Would Bob Auld like to speak?



My name is Bob Auld, and I'm a representative of the Desert Rough Riders. I'm located in Hobbs, and what I'd like to just bring to your attention is also the Alternative A, or the amendment A, and this last year and the past 3 years we put on an Enduro. and I just wanted to aprise you to the fact that we have worked real closely with BLM and with your archeologists on the Indian artifacts and any time any of it was located everything was rerouted around it. We have also took the responsibility of a bond which insured that the premises was clean, and matter of fact this last week we also received our bond back from the BLM after they inspected the area, and we also in our area we also carried insurance and I just want it to be brought to the fact that we realize our responsibility out there and that it can be misused, but I just want it to be brought to the fact that with this the way it has been we pretty much understood our responsiblity. Appreciate your time.

Dave Mari - Walter Biebelle, I'm not sure I pronounced your name correctly.

Mr. Beibelle -well, that's close enough, we don't care, I'm not a public speaker. First of all, I'm Walter Biebelle, and I'm from southern New Mexico, and I want to thank not only the BLM but every other organization that drags all us guys up here and tries to make public speakers out of us. Hell, I'm not and I know a bunch more aren't either, you know. I'd like to ask you guys a question, how much money did you spend to come up with all these programs when what we've got's working?

Mr. Mari - Would you like to go on with your statement?

Mr. Beibelle - I'll put down no answer on that.

I don't feel like you should be spending money on something that all of us are opposed to, or just about. Why don't we leave it like it is or try to improve on what we got? I'm definitely opposed to fencing. My reason is cause the fences don't belong to you all. They belong to the guys who put 'em there and the BLM didn't. On my particular situation, anyway. And, if we improve grazing that will help wildlife. Anytime you plant grass or improve grazing or anything else you're helping your little wild animals. Like I said now, I'm not a public speaker. The fifth thing I'd like to mention is I'd like to propose cutting across that National Park down to 160 acres and I'm not sure what that's not about 5 times too much. And, in closing I'd like to say that just as long as I can afford to pay my grazing lease, I'm not going to work with you guys in any way. Thank you for your time.



Dave Mari - The last name I have on my list, with a question mark behind it so it may not be the right name, J.L. Davidson?

I'm J. Ellis Davidson, with a ranch out west of town. I'm a trained archeologist. I'm a social worker with 15 years experience. I have, unfortunately, not had a terrible lot of time to spend thoroughly reading and attempting to understand this RMP. However, I am appalled. This is a time of extreme governmental fiscal deficit. This is two inches thick, weighs approximately three pounds, undoubtedly was prepared by people totally committed in a very self serving interest. I take issue with several areas, this thing prefers to fall over, I have some serious questions about the subject of access. Tied in with that I have very serious questions about recreational vehicle use. If in your infinite wisdom of making your rules and regulations, and I work for a government agency and know all about making rules and regulations, so don't question that,

**T-49**

if you would come up with just one thing, you could help a lot of us. And that is a sensible, workable definition of what a road is. The first guy that drives off of a designated public road is illegal, apparently. He leaves a set of tracks in the grass or in the mud, or in the sand or the dirt, or whatever. After that, anybody can come along and hey, this is a road, and they do it. We have roads, in quotes, on our ranch that go nowhere, just up on top of a ridge; they exist for the sole purpose of somebody with a 4-wheel drive who wants to prove he can be very macho and drive up a steep hill. Now anybody can get up to a steep hill, but you don't always have to go straight up to get there. So, some assistance in that area, of defining what a road is, and the access question would be very useful. You're policy on fire patrol, and brush.

The Forest Service learned as a result of the cottonwood fire about 12 years ago,

**T-50**

that burning of brush can be very beneficial. There are a lot of areas in southeastern New Mexico between Carlsbad and the Guadalupe Mtns. that would be improved tremendously if selective burning were done in the draws. This might help in restoring the Pecos River that Mr. Thornton wants. I'm not against restoring things. I'm not sure it can be done very easily, but I do think that the management of the brush control needs some very serious attention and some

**T-51**

modernization in thinking. And, one more thing. The Buffer Zone. If the Forest Service feels some compelling need to have a buffer zone around their thousands of acres that they have appropriated for themselves of our public land, let them

(continued next page)



## T-51 (cont.)

establish a buffer zone with inside the existing area that they already have. I think you people in BLM are being used as a cat's paw to meet their needs, not BLM's and not the BLM permittees and the multiple use public. Thank you.

Dave Mari - those are all the speakers that I have on my list up here. Would anyone else like to make a statement?

I'm John White, Queen Route. An old friend of mine came into dog canyon in 1913 and speaking of game, I've heard that if the rancher wasn't there that there'd be a lot more deer, and he came here in 1913 and I've known the old feller about 49 years, or something like that, and I've never heard him tell anything that wasn't right or that he ever colored anything to make it seem something that it wasn't. That's Sam A. Hughes, of Queen Route. He told me that when he came there that all the deer that was in Dog Canyon in that Guadalupe area up there was around those seeps and little springs and they were little deer, about that high, that's all they were. They'd trim the brush, just as high as they could reach around those springs and then there weren't any deer back off in the brokeoffs, or back up on top of the mountain or back in there away from water until ranchers went in there and started building tanks and build waterins back in there and said maybe in the rainy season that you could go back in there and might see one or two deer back in there far away from those cedars, but you never seen any that, when it was dry. So to that, the rancher is keeping the deer population up, whether anybody wants to believe that or not. Thank you.

Dave Mari - Thank you Mr. White.

Would anyone else like to speak? Yes, would you please come on up?



I was here this afternoon and I made a statement that I would like to clarify just a little bit.

Dave Mari - could I get you to restate your name, please?

Jess Rayroux, Carlsbad, NM. I'm a rancher out west of Carlsbad. This particular statement that I made was about the oil companies breaching these pits and letting the water out. I was corrected when I got home by my wife. She said it's not the oil companies themselves, but it's the contractor's that the oil companies hire to do this work. They feel like that they can go in there and breach these tanks and get their job done quicker, or something by letting this water out and drying up these pits before they're actually have time for the water to evaporate, or to be hauled off. This is very detrimental to the land, I feel like. But I did want to make that one clarification that possibly it isn't the oil companies themselves, but it is the contractors that they hire to do their work. Thank you very much.

Dave Mari - Thank you very much Mr. Rayroux. I don't see anyone else expressing an interest in speaking so what I'd like to do is thank everyone for sharing your views. Yes ma'am, you wish to speak?

I left a statement that I wrote up in about 45 minutes cause I only got the book yesterday, and I wondered if it was read and if anybody has any questions.

Dave Mari - We will do a complete analysis of all of the comments that we receive through the comment period which runs through, well actually for another month.

We have a copy of your original and your original was mailed to you. But the copy is here (Guadalupe Martinez).

Well, there were quite a few things I'm opposed to, such as the poisoning of mesquite, pulling up mesquite, you know, cause it holds the soil in place.

And

Dave Mari - Ma'am, could I get you to state your name for the record?

Florence T. Galt - and then, I've been trying to educate myself on the WIPP. I talked to Mr. Cooper and I checked out about 6 books from the library and they've just been laying around the apartment, I haven't read them and I got an overdue notice that they were priceless, so I had to rush those back here, but that brought out the point that . . . . (unable to transcribe further due to background noise.)

Dave Mari - Mrs. Galt, your 5 minutes are up. We appreciate your comments. If no one else wishes to speak, I'd like to thank all of the speakers who were willing to share their comments with us. I'd like to thank the people here who attended the meeting for taking the time to show your interest in public lands. You've done a good job of focusing in on the issues and I'd like to thank you, and drive home carefully. This hearing is adjourned.



## RESPONSES TO COMMENTS FROM PUBLIC HEARINGS

The following responses have been made for specific identified comments from the afternoon and evening public hearings held on May 7, 1986. Because many of the hearing participants subsequently mailed in comments or many of the comments were similar to others mailed in, most of the responses refer to the responses made for the written comments.

T-1 Each Special Management Area (SMA) was reviewed to ensure that existing stipulations/regulations, etc., are inadequate and new stipulations are necessary for resource protection. The rationale for each SMA was expanded and is available for review in the Carlsbad Resource Area.

T-2 See response to comment 37-16.

T-3 See response to comment 27-2.

T-4 See response to comment 27-2.

T-5 See response to comment T-1.

T-6 The potential for oil and gas is indeed of critical concern in addition to acreage. High and moderate potential areas were determined based on KGS delineations. These areas within a KGS have high potential while all other areas have moderate potential. A map showing KGS boundaries is available for review in the Carlsbad Resource Area. FEIS Table 2-1 shows the acreage of high and moderate potential affected by NSO stipulations.

T-7 It is Bureau procedure to include more general stipulations at the lease issuance stage followed by more detailed environmental analysis of site specific exploration and development plans at the APD stage. It is important that prospective lessees be aware prior to lease issuance what possible or definitive restrictions they would have to contend with. Enough flexibility is built into most stipulations to provide for site-specific adjustment to accomodate development while protecting the identified resource values.

T-8 Southwest Chaves County is currently under a cooperative fire suppressison effort between the BLM, U.S. Forest Service, Hope Fire Department, Penasco Fire Department, Dunken Fire Department, and Pinon Fire Department. Efforts to coordinate more effective fire prevention, protection, and suppression will continue among all parties.

T-9 Nest platforms on existing oil and gas facilities have met with limited success and is not the preferred location for raptors. The greatest impact to raptors is not from existing facilities but from active drilling operations during the nesting period. See response to comment 27-2.

T-10 See response to comment 50-2.

T-11 See response to comment 37-9.

T-12 See response to comment 51-2.

T-13 It is not the objective of the BLM to encourage unlimited access but to ensure reasonable access to large blocks of public land. See response to comment 37-51.



T-14 See response to comment 57-1.

T-15 See response to comment 24-12 and 57-3.

T-16 See response to comments 11-3 through 11-5.

T-17 See response to comment 11-5.

T-18 See response to comment 20-2.

T-19 See response to comment 11-2.

T-20 See response to comment 20-12.

T-21 See response to comment 27-2.

T-22 See response to comment 25-3.

T-23 See response to comment 24-5.

T-24 See response to comment 24-5.

T-25 See response to comment 24-13.

T-26 This RMP does not preclude recreational development in other parts of the Resource Area. Such development may be part of future activity plans. However, with existing budget constraints, it is unlikely that the BLM will undergo extensive recreational development in the near future. Rather, opportunities for continued dispersed recreation will be expanded by such actions as increased access and habitat protection.

T-27 See response to comment 55-21. Management prescriptions for the Pecos River Corridor SMA (23) are designed to enhance riparian habitat along the Pecos River for wildlife and recreation (see FEIS Table 2-4).

T-28 The R&PP leases described in the DEIS, page 3-3, are existing leases for either recreation or other public purposes operated by local government agencies. This includes some of the developed recreation facilities in the Resource Area but is only a very small part of the overall recreation base.

T-29 Range improvement funds are readily available because a portion of the grazing fees generated from the Resource Area must be spent on range improvement projects. Funding for recreation projects comes from general program funding subject to current budget constraints.

T-30 See response to comment 26-2.

T-31 See response to comment 37-35.

T-32 Under the proposed plan, there would be no earthen pits west of the Pecos River or within any Special Management Area east of the Pecos. Earthen pits east of the Pecos would be restricted to lined pits except in areas described in Order No. R3221-B where the ground water is already saline. This is a very sensitive issue and subject to possible additional future constraints based on studies currently underway.



T-33 Because of the large number of existing caliche pits, the BLM only authorizes new pits if it is totally unfeasible to haul from existing pits. Visual resource management guidelines are applied to all new pit applications to reduce visual impacts. Although very few pits have been abandoned for fear of the need for future reentry, your reclamation suggestions will be incorporated in future pit abandonment reviews.

T-34 See response to comment 26-3.

T-35 See response to comment 29-1.

T-36 Page 2-8 describes the BLM commitment toward minimizing soil erosion on public lands. The BLM has an ongoing program of identification of high erosion areas for erosion control projects. However, identification of specific projects is not within the scope of the RMP.

T-37 See response to comment 24-3.

T-38 DEIS Table 3-10 displays how much money each industry produces. Footnote 2/ points out that although only 0.4 percent of the total revenues within the Carlsbad Resource Area come directly from operations on BLM land, this portion is an integral part of the overall livestock industry and, hence, more valuable than the percentage indicates. Consequently, the reader is cautioned against directly comparing the significance of the BLM Range livestock dollar output to other industry output.

T-39 See response to comment 24-16. The methodology for developing ranch budgets has been revised and included as FEIS Appendix G.

T-40 Although obviously nobody can accurately predict the future, it is necessary to make some basic assumptions from which impacts to all alternatives can be based for comparison. The assumptions on DEIS page 4-1 were designed to be reasonable and applicable.

T-41 See response to comment T-39.

T-42 See response to comment 24-19.

T-43 See response to comment 50-2.

T-44 The small amount of acreage proposed for acquisition is to consolidate lands of high resource values (i.e., caves, T&E species, cultural resources, wetland habitat, etc.) for resource protection and improved manageability. It is difficult to manage sensitive resources when land patterns are so mixed that only partial management is possible. Consequently, the positive elements listed on DEIS Table 4-6 reflects the advantages of preserving the integrity of those identified sensitive resources as units to be managed as a whole.

T-45 It is not the objective of the BLM to encourage unlimited access but to ensure reasonable access to large blocks of public land.

T-46 Figures on DEIS Map 3-2 only refer to BLM lands. The legend on DEIS Map 3-2 has been corrected to read "BLM" instead of "Federal" in FEIS Chapter 3 to eliminate this misconception.

T-47 See response to comment 24-13.

T-48 See response to comment 50-2.

T-49 The only official road definition was developed for the BLM Wilderness inventory process and essentially defines a road as a way which has been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constitute a road.

T-50 The BLM is pursuing an active prescribed fire program for many vegetation types west of the Pecos River. Under the proposed plan, prescribed burns would be completed on approximately 62,000 acres.

T-51 No buffer zone has been proposed around Forest Service lands.



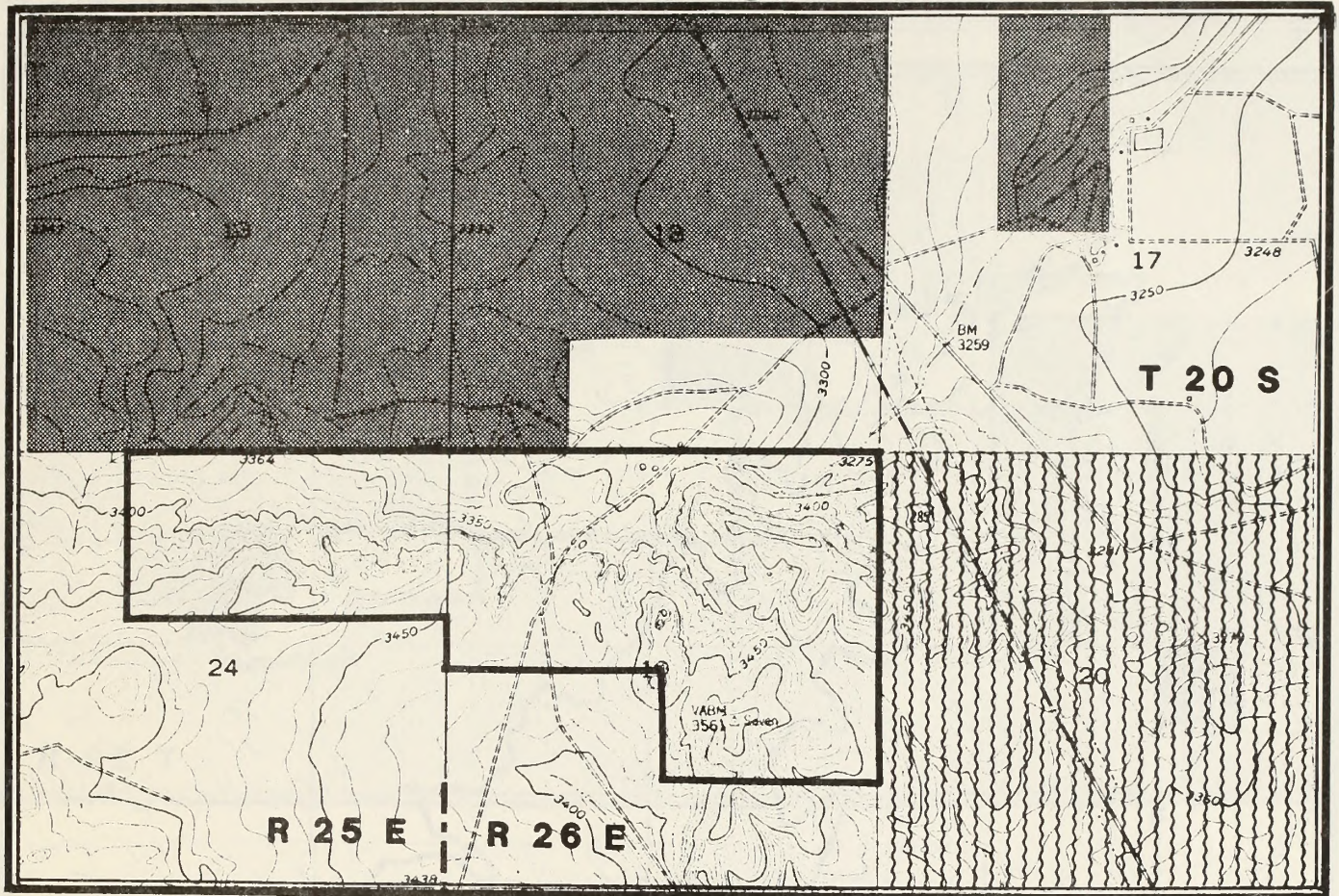
# APPENDIX

E







SMA No. 1- SEVEN RIVERS HILLS ACEC (540 Acres)




MAP LEGEND

 AREA of CRITICAL ENVIRONMENTAL CONCERN (ACEC)

 BLM

 PRIVATE

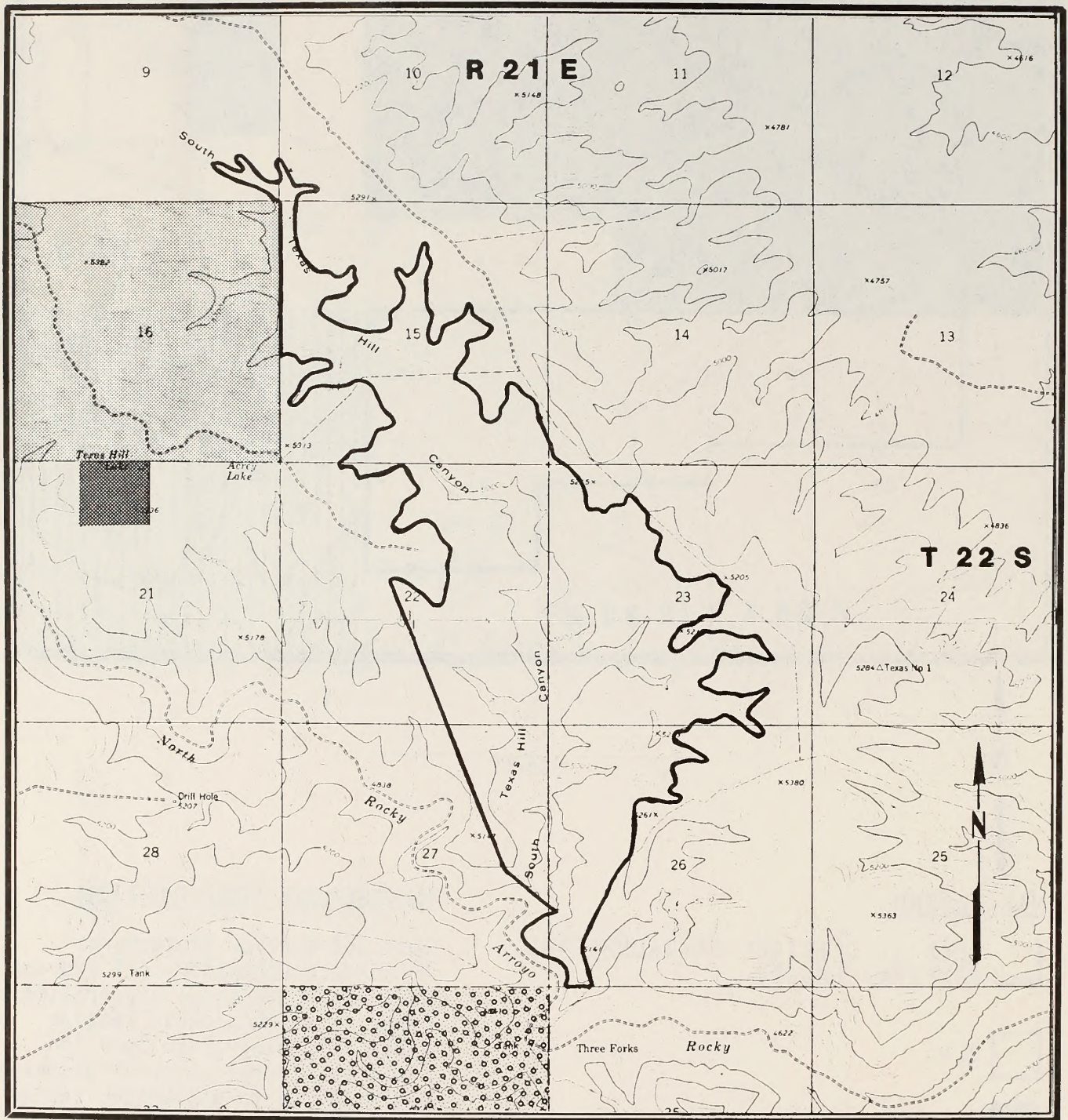
 BUREAU of RECLAMATION

MANAGEMENT PRESCRIPTION

Restrict surface disturbance  
 No Surface Occupancy- oil and gas  
 Restrict geophysical exploration  
 Close to solid mineral leasing  
 Close to mining claim location  
 Close to mineral material disposal  
 Limit ORVuse to designated routes  
 Limit fire suppression  
 Manage for VRM Class II objectives  
 Designate right-of-way avoidance area



SMA No. 3- SOUTH TEXAS HILL CANYON RESEARCH NATURAL AREA (1,360 Acres)



MAP LEGEND

-  BLM
-  STATE
-  NATIONAL FOREST

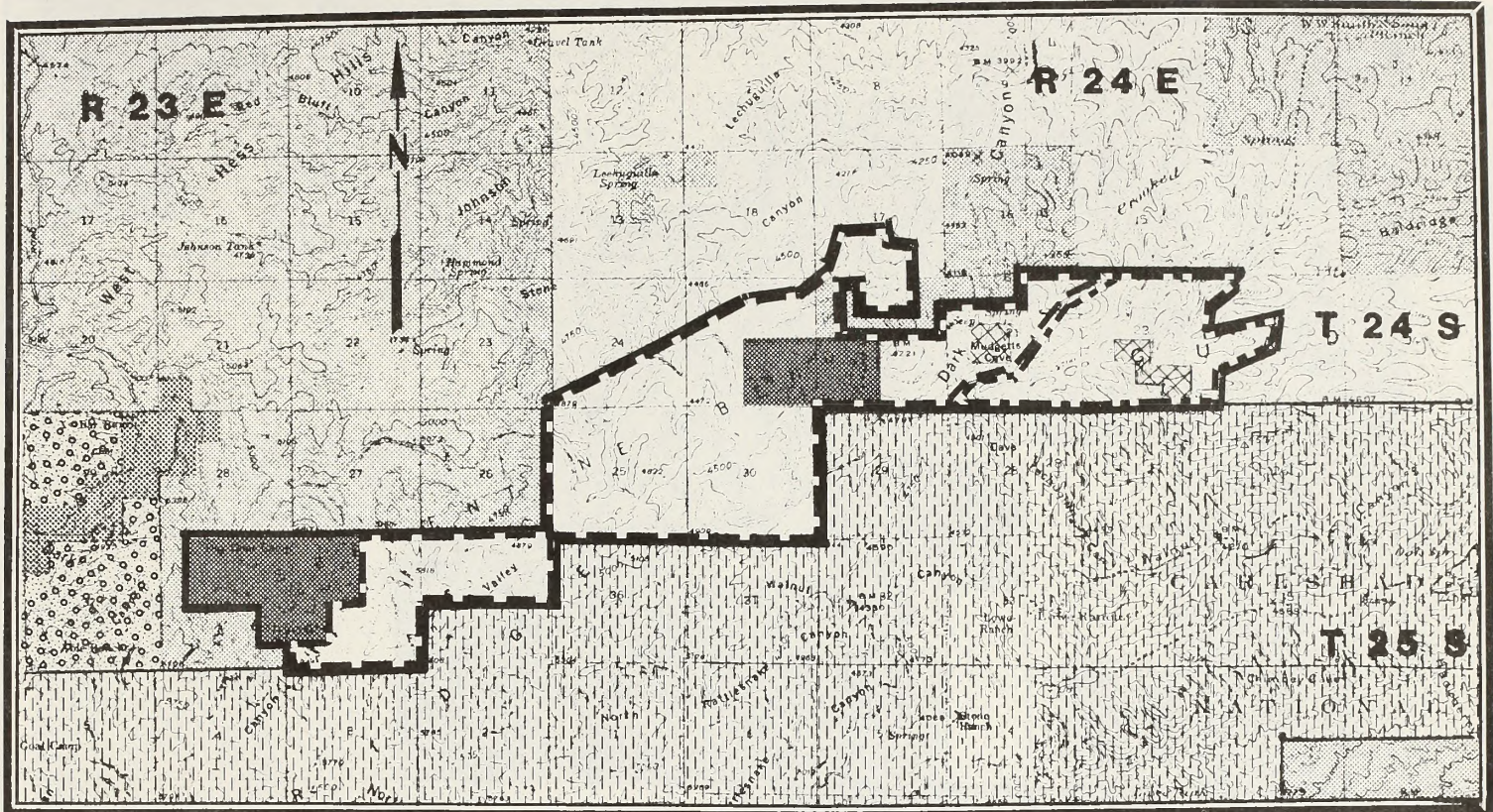
0      1/2      1 mile  
SCALE

MANAGEMENT PRESCRIPTION

- |                                    |                                  |
|------------------------------------|----------------------------------|
| Restrict surface disturbance       | Restrict geophysical exploration |
| No Surface Occupancy- oil and gas  | Remove livestock                 |
| Close to mineral material disposal | Limit fire suppression           |
| Limit ORV use to designated routes |                                  |









SMA No. 4- DARK CANYON AREA of CRITICAL ENVIRONMENTAL CONCERN



0 1 3 miles  
SCALE

MAP LEGEND

	SMA BOUNDARY
	ACEC ZONE 1
	ACEC ZONE 2
	BLM
	SRMA
	PRIVATE
	STATE
	NATIONAL PARK
	NATIONAL FOREST

MANAGEMENT PRESCRIPTION

ACEC Zone 1

No Surface Occupancy-oil and gas  
Restrict geophysical exploration (50 acres)  
VRM Class II  
Right-of-way avoidance area

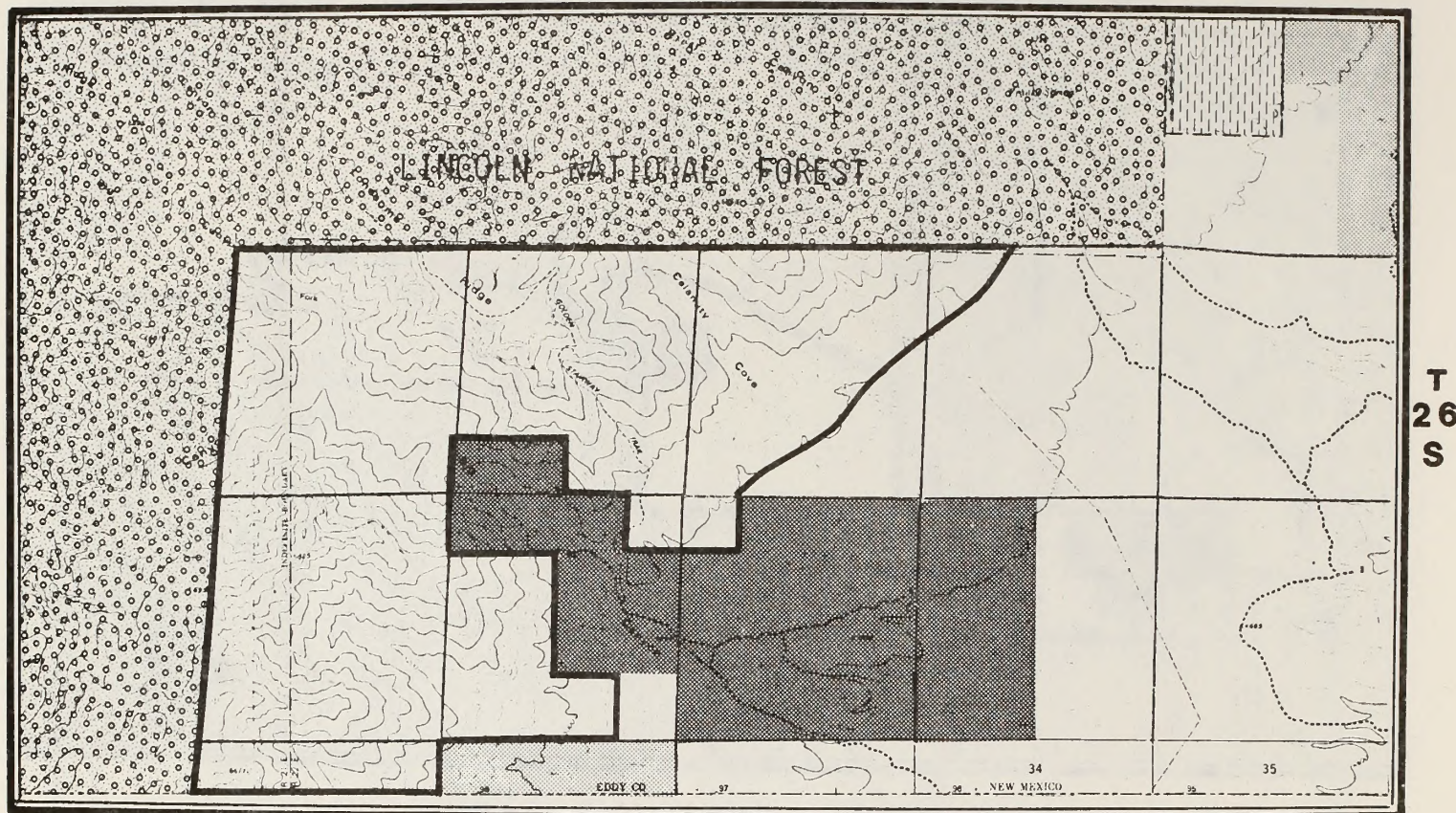
ACEC Zone 2

No Surface Occupancy-federal minerals/private surface (320 acres)  
Restrict geophysical exploration  
Temporary stipulation on oil and gas drilling activities: 4/1 to 9/15 (730 acres)  
VRM Class II (100 acres)  
VRM Class III (730 acres)

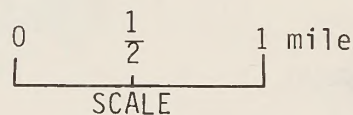
Both Zones

Restrict surface disturbance  
Close to mineral material disposal  
Limit ORV to designated routes  
Limit fire suppression





R 22 E



MAP LEGEND

— ACEC/ ONA BOUNDARY

□ BLM

▤ NATIONAL FOREST

▨ NATIONAL PARK

▩ PRIVATE

□ STATE

MANAGEMENT PRESCRIPTION

Restrict surface disturbance

No Surface Occupancy: oil and gas

Close to solid mineral leasing

Restrict geophysical exploration

Close to mining claim location

Close to mineral material disposal

Close to ORV use

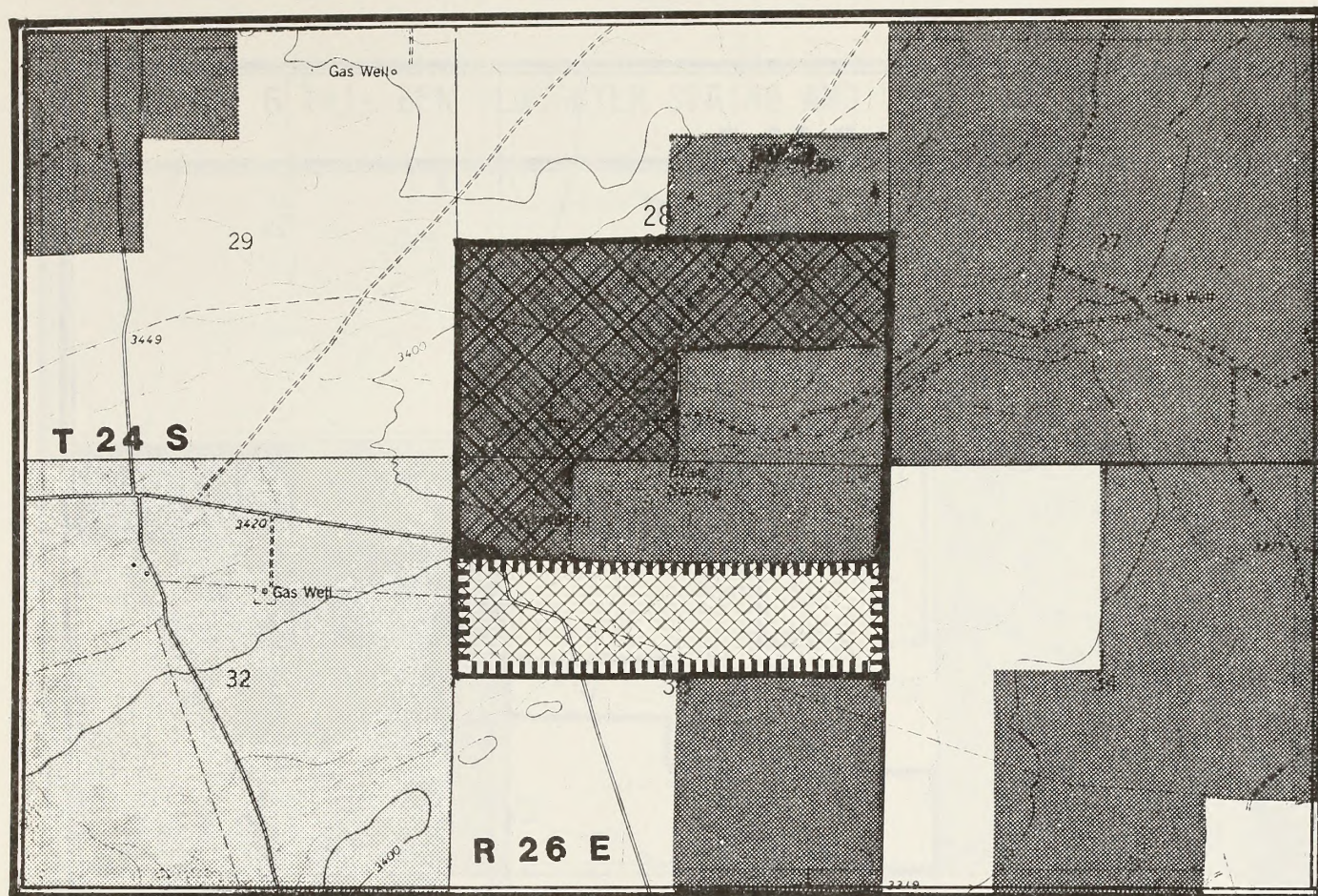
Limit fire suppression

Acquire 1.5 miles of access

Designate as rights- of- way avoidance area

Manage for VRM Class I objectives





#### MAP LEGEND

— SPECIAL MANAGEMENT AREA

■■■■■ AREA OF CRITICAL ENVIRONMENTAL CONCERN

□ BLM

■ PRIVATE

▨ FEDERAL MINERAL ESTATE

□ STATE LAND

#### MANAGEMENT PRESCRIPTIONS

##### FEDERAL MINERAL ESTATE

Close to solid minerals leasing  
Close to mining claim location  
Close to mineral material disposal  
Acquire 280 acres private surface

##### AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC)

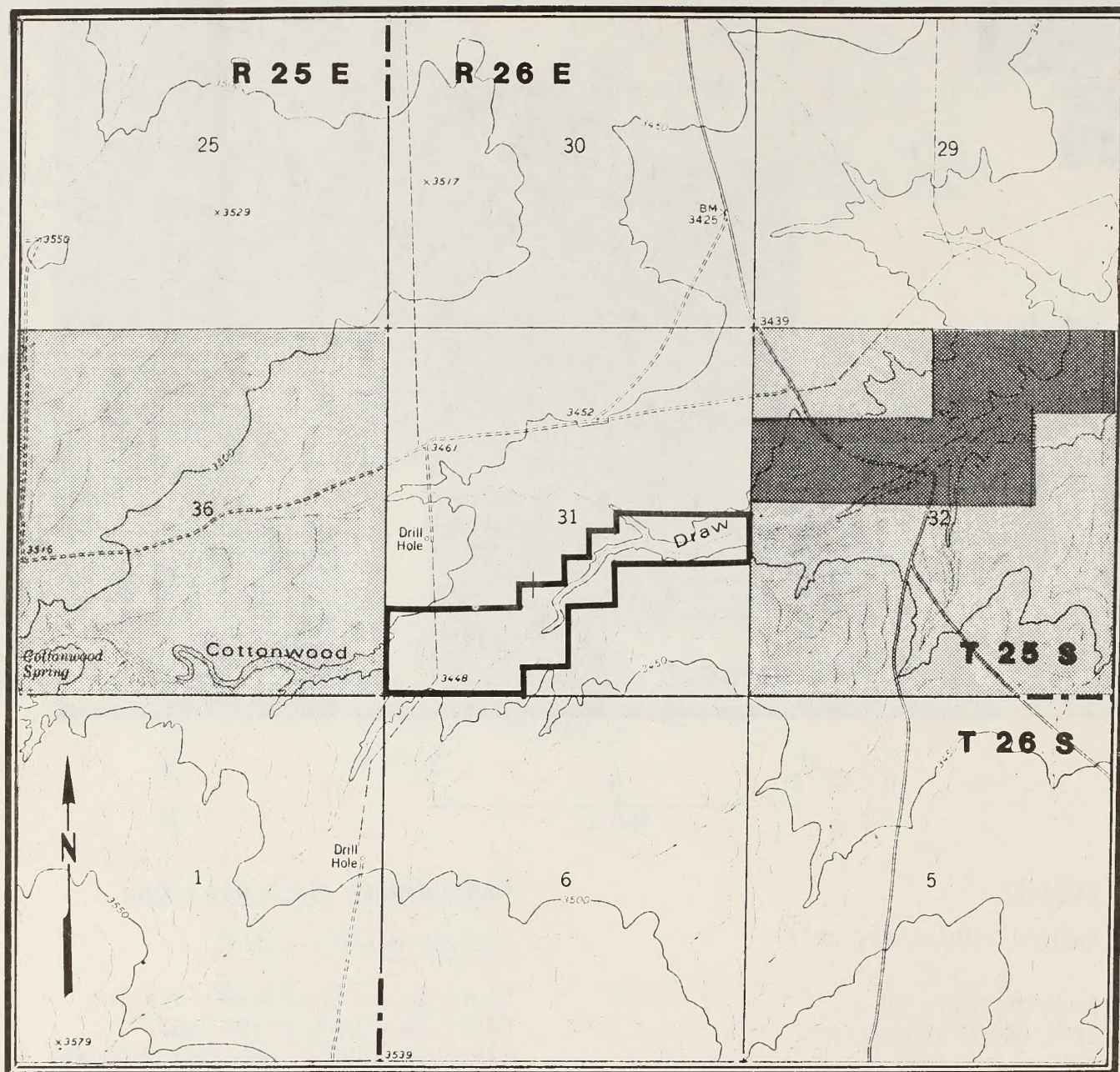
Minerals closures listed above  
Restrict surface disturbance  
Remove livestock grazing  
Limit ORV use to designated routes  
Limited fire suppression  
Right-of-way avoidance area

##### PRIVATE SURFACE AND MINERALS

Acquire 200 acres private surface/  
private mineral estate




SMA No. 6 (c)- COTTONWOOD SPRING AND DRAW (108 Acres)



0  $\frac{1}{2}$  1 mile

SCALE

MAP LEGEND

 HABITAT MANAGEMENT AREA

 BLM

 STATE LAND

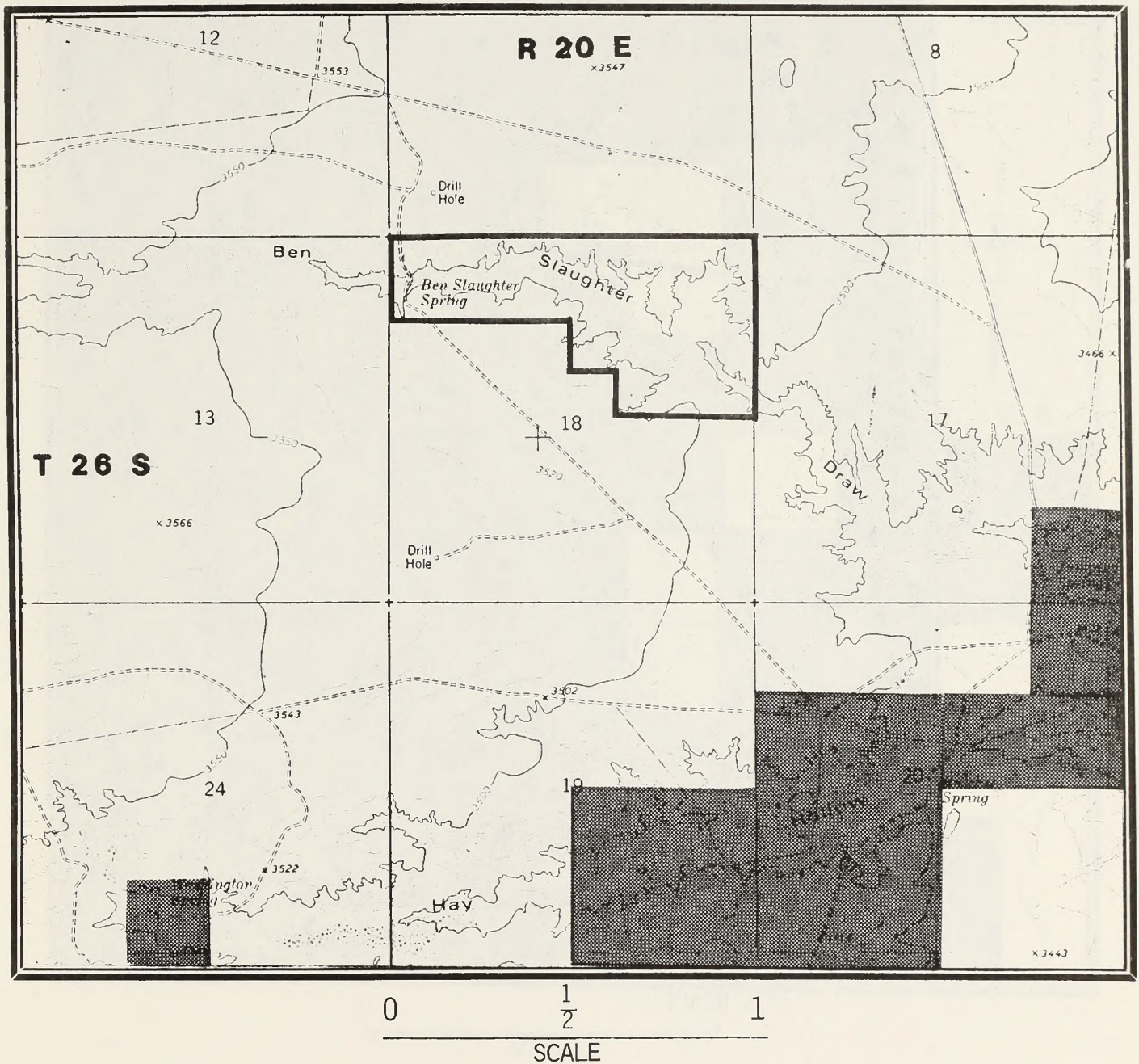
 PRIVATE

MANAGEMENT PRESCRIPTION

Restrict surface disturbance	Close to mining claim location
No Surface Occupancy-oil and gas	Close to mineral material disposal
Restrict geophysical exploration	Remove livestock
Close to solid mineral leasing	Limit fire suppression
Close to ORV use	Prescribed burning: (30 acres)



SMA No. 6 (e)- BEN SLAUGHTER SPRING AND DRAW (205 Acres)



MAP LEGEND

— RIPARIAN CRITICAL HABITAT AREA

□ BLM

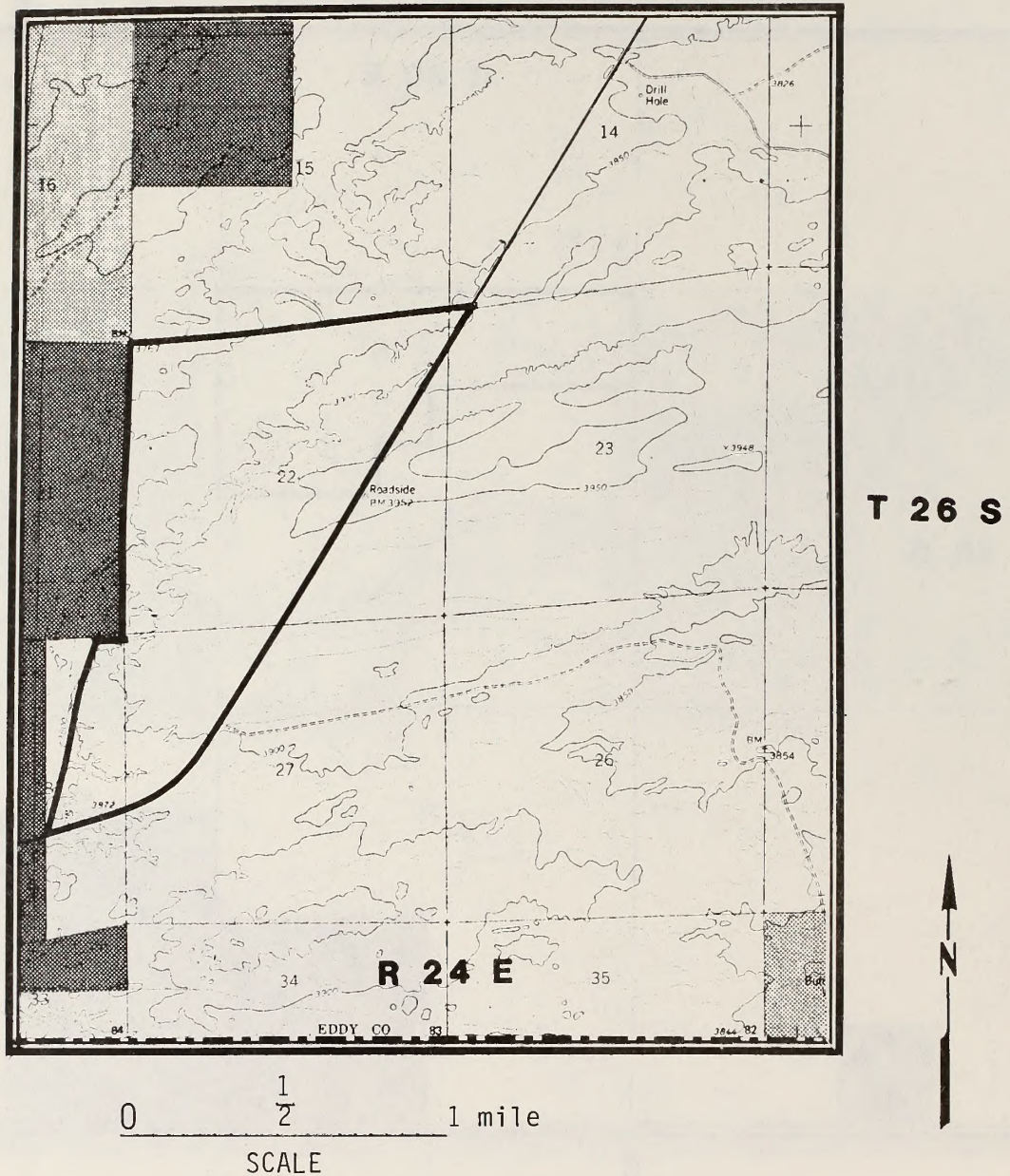
▨ STATE LAND

MANAGEMENT PRESCRIPTION





Restrict surface disturbance  
 No Surface Occupancy- oil and gas  
 Restrict geophysical exploration  
 Close to solid minerals leasing  
 Close to mining claim location  
 Close to mineral materials disposal  
 Remove livestock grazing (40 acres)  
 Limit ORV use to designated routes  
 Limit fire suppression  
 Designate right-of-way avoidance area



SMA No. 7- YESO HILLS RESEARCH NATURAL AREA (640 ACRES)



MAP LEGEND

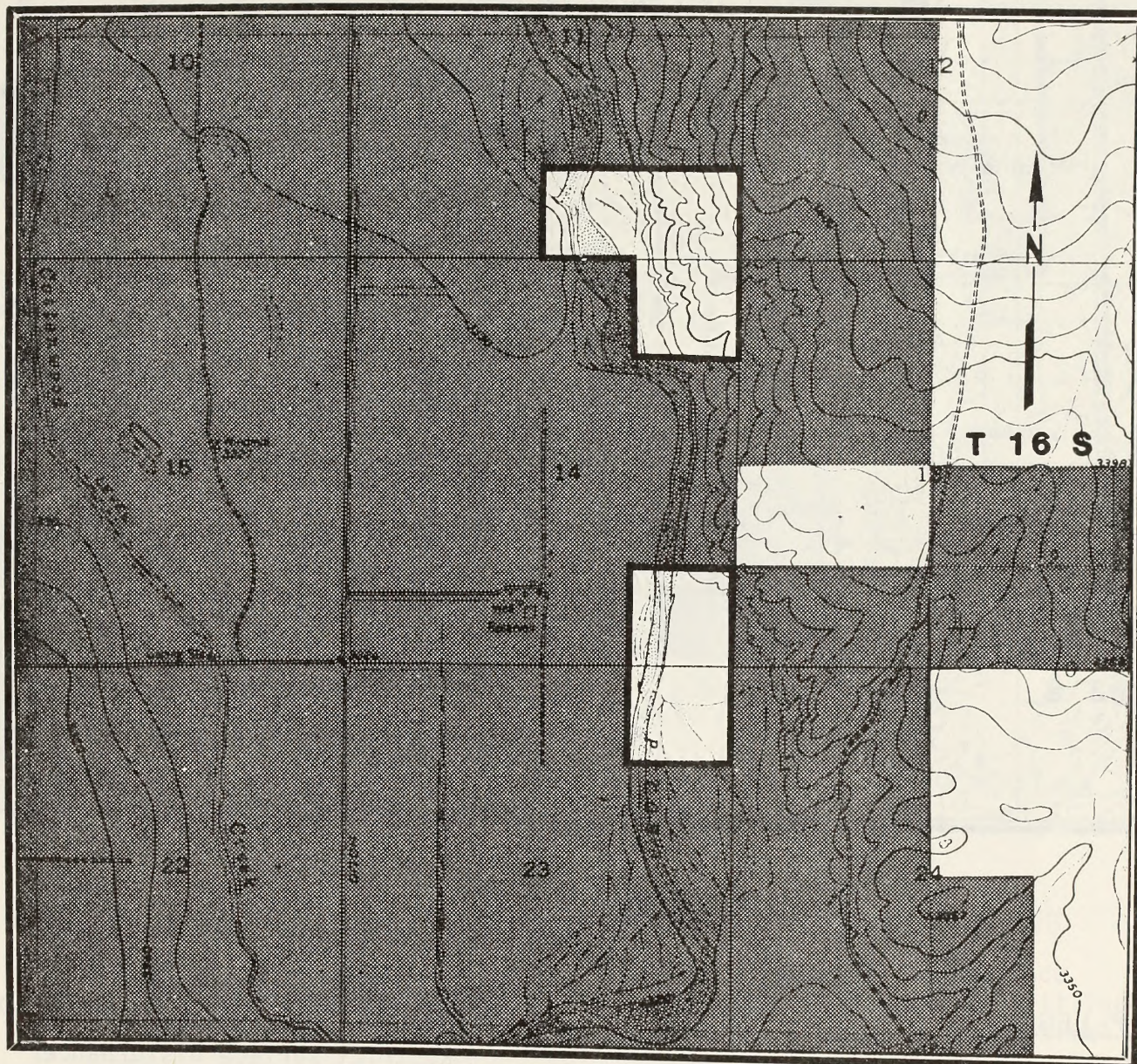
-  RESEARCH NATURAL AREA BOUNDARY
-  BLM
-  STATE LAND
-  PRIVATE

MANAGEMENT PRESCRIPTION

- Restrict surface disturbance
- No Surface Occupancy- oil & gas
- Close to solid mineral leasing
- Close to mining claim location
- Close to mineral material sales
- Close to livestock grazing
- Limit ORV use to designated routes
- Limit fire suppression
- Right-of-way avoidance area



SMA No. 8- BLUNTNose SHINER HABITAT MANAGEMENT AREA (200 Acres)  
**R 26 E**



MAP LEGEND

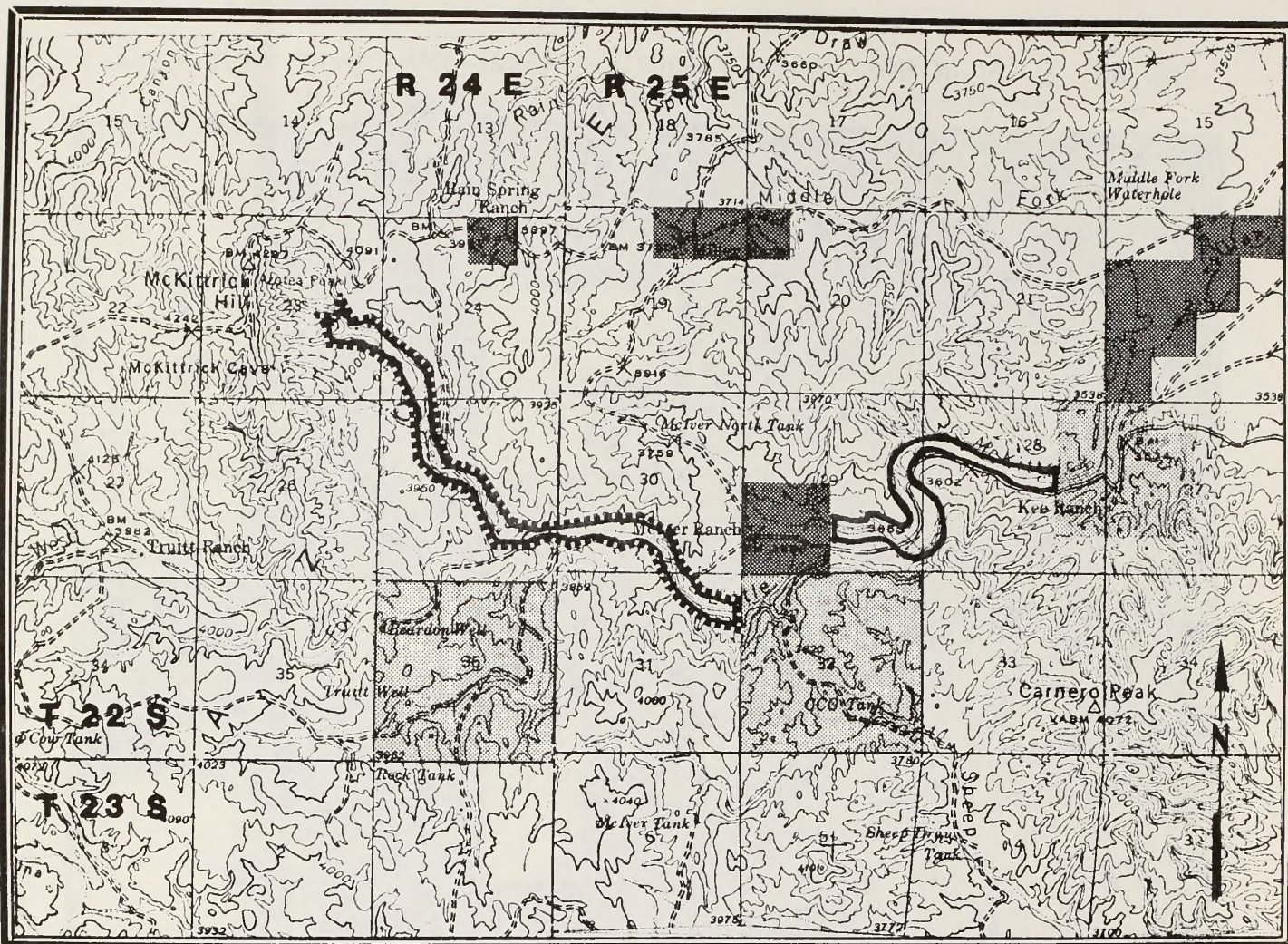
- HABITAT MANAGEMENT AREA BOUNDARY
- BLM
- PRIVATE

MANAGEMENT PRESCRIPTION

- Restrict surface disturbance
- No Surface Occupancy- oil and gas
- Close to solid minerals leasing
- Close to mining claim location
- Close to mineral material disposal
- Close to livestock grazing
- Close to ORV use
- Limit fire suppression
- Rights-of-way avoidance area



# SMA No. 9- LITTLE MCKITTRICK DRAW HABITAT MANAGEMENT/ RESEARCH NATURAL AREA



0 1 2 3 miles

SCALE

## MAP LEGEND

THREATENED or ENDANGERED SPECIES  
HABITAT MANAGEMENT AREA (Both segments of SMA = 500 acres)

RESEARCH NATURAL AREA - 100 acres

BLM

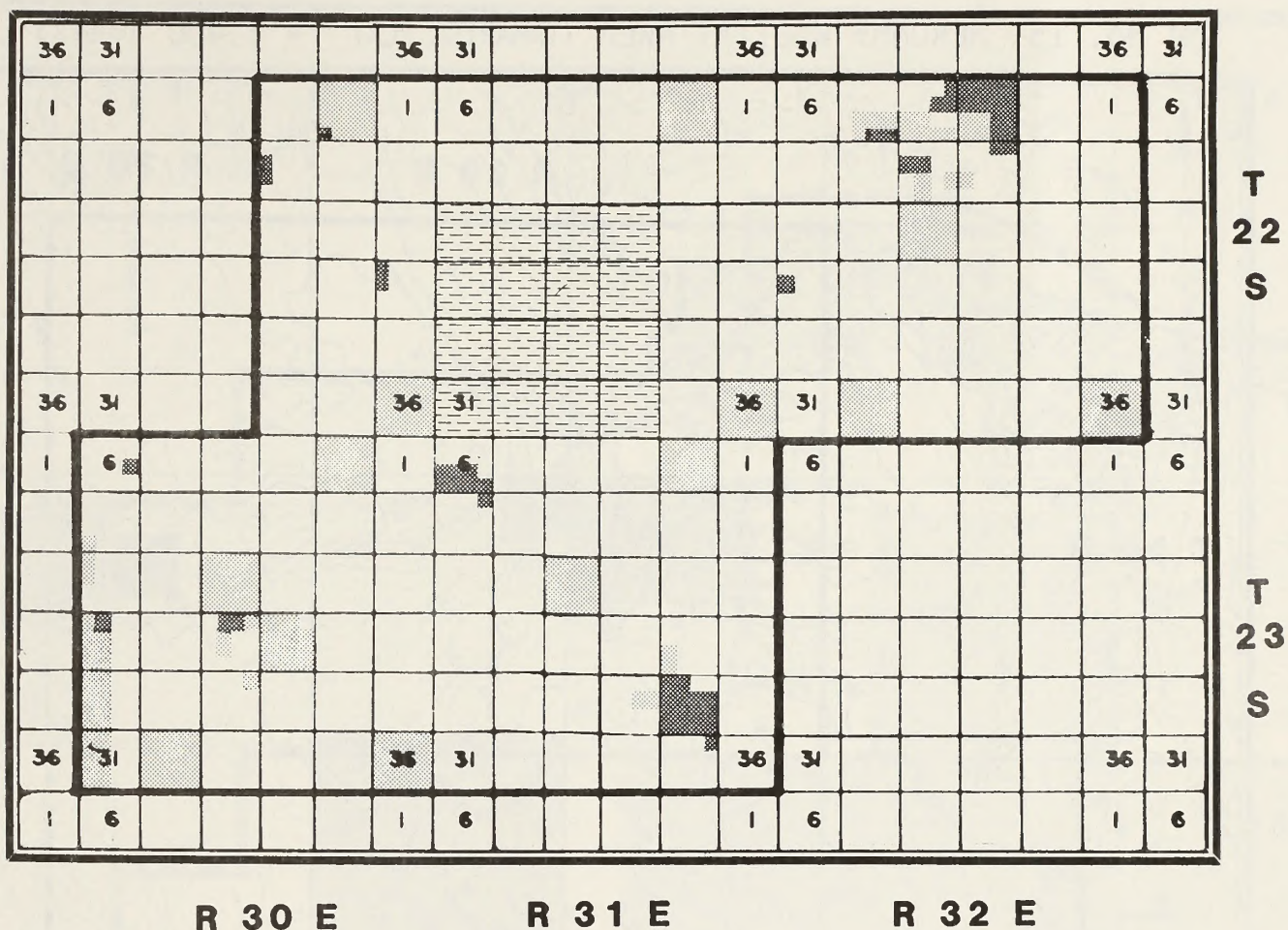
STATE LAND

PRIVATE

## MANAGEMENT PRESCRIPTION (500 ac.)

Restrict surface disturbance  
Restrict geophysical exploration  
Close to solid mineral leasing  
Close to mining claim location  
Close to mineral material disposal  
Remove livestock grazing  
Close to ORV use  
Limit fire suppression  
Rights-of-way avoidance area





#### MAP LEGEND

— AREA OF CRITICAL ENVIRONMENTAL CONCERN (ACEC) BOUNDARY

□ BLM

□ STATE LAND

■ PRIVATE

▨ DOE WITHDRAWAL (WIPP)

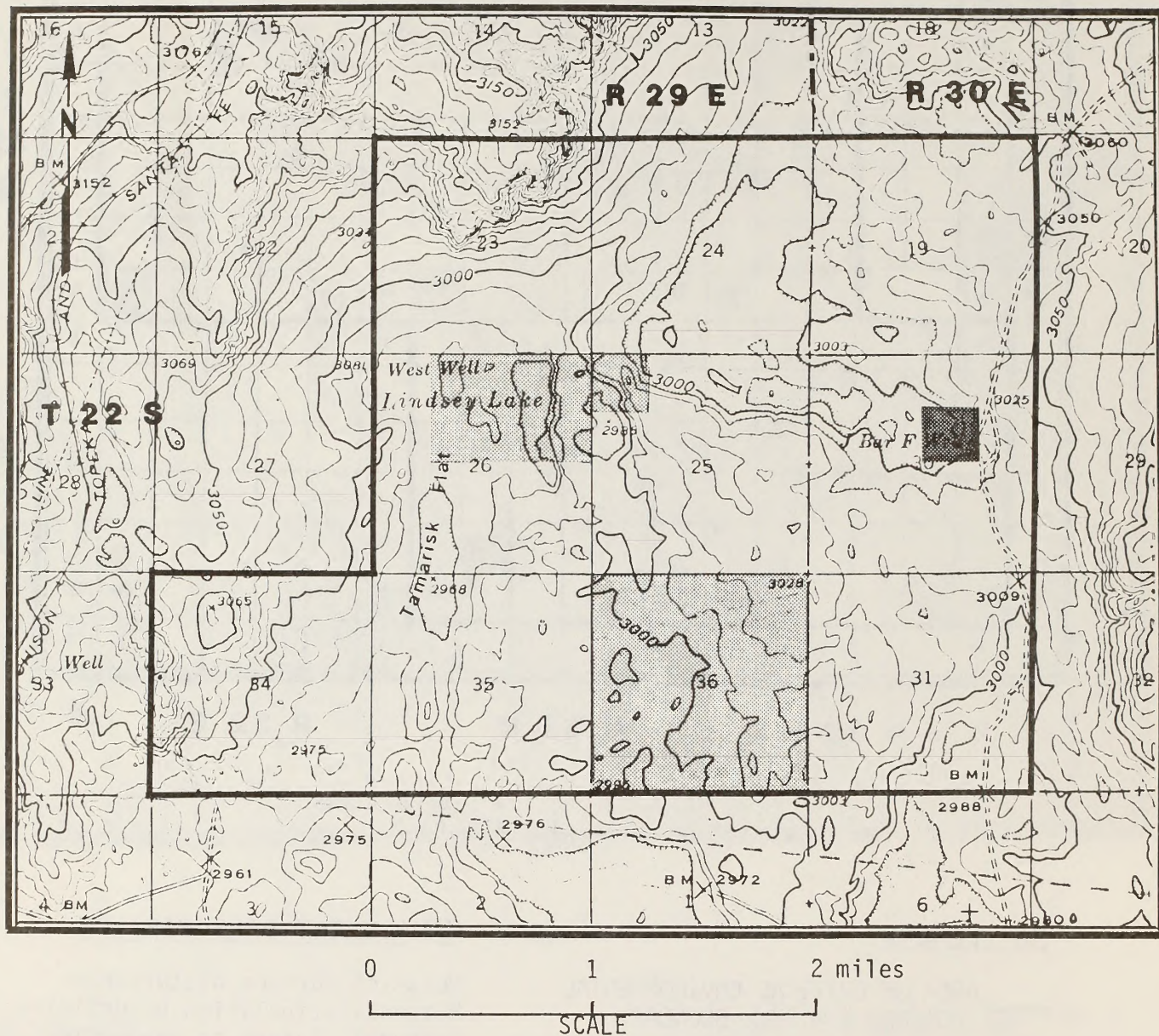
#### MANAGEMENT PRESCRIPTION

Restrict surface disturbance  
Seasonal stipulation on drilling  
Seasonal closure to geophysical exploration  
(Prescription applies to 1/4 mile radius of active nests of great horned owl, Swainson hawk or Harris hawk.)

Full fire suppression (89,360 ac.)



SMA No. 15- HERONRY HABITAT AREA (TAMARISK FLAT - 6,400 Acres)



MAP LEGEND

- HABITAT MANAGEMENT AREA
- BLM
- STATE LAND
- PRIVATE

MANAGEMENT PRESCRIPTION

Year- round special stipulations to be applied case-by-case to known heronries:

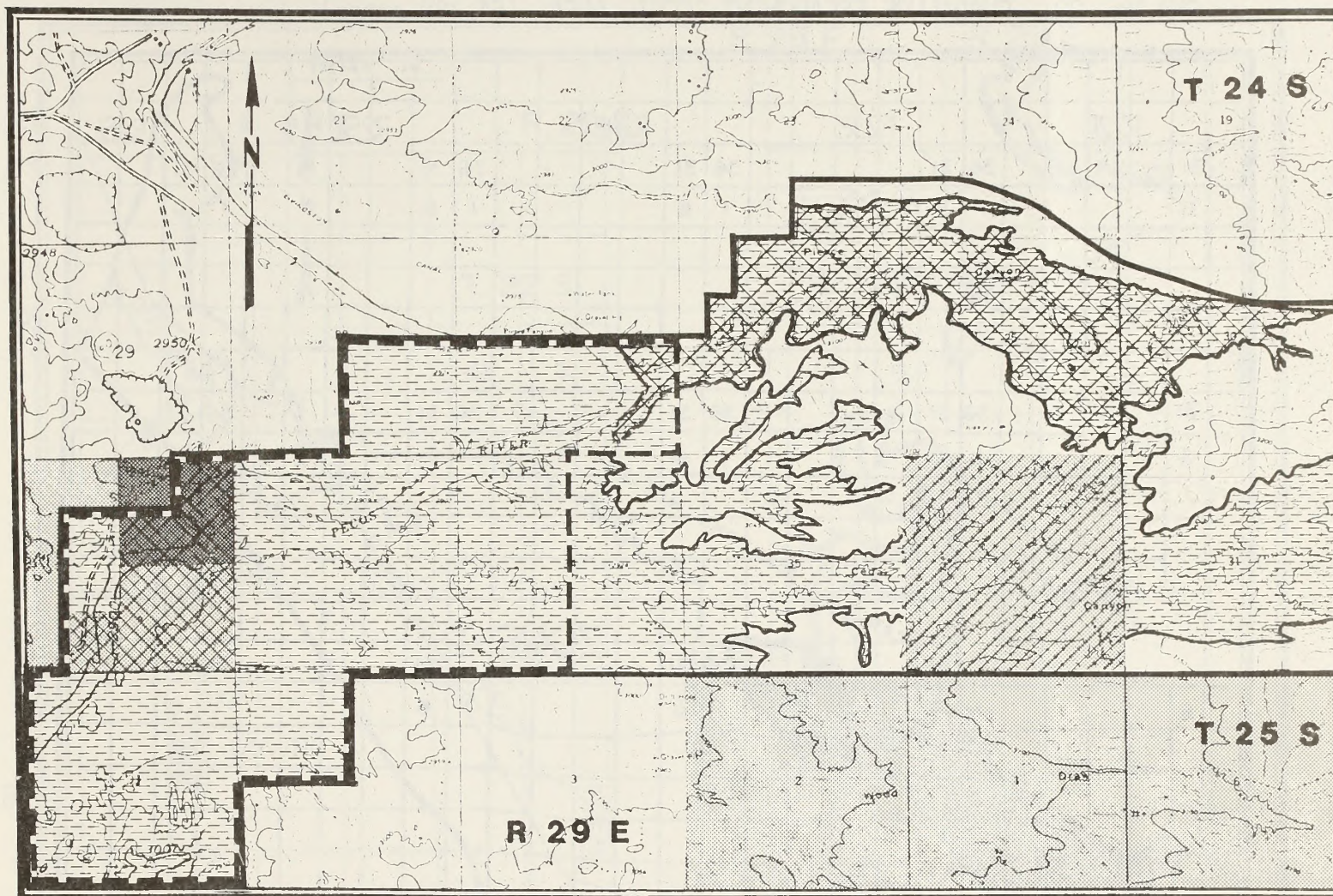
- Restrict surface disturbance

Temporary stipulations to be applied to 1/4 mile radius (126 ac.) around active heronries:

- Seasonal stipulation on drilling
- Seasonal restriction on geophysical exploration activities

Full fire suppression on 6,400 acres  
Seasonal limitation on ORV use \*\*





0 1 2 miles  
SCALE

### MAP LEGEND

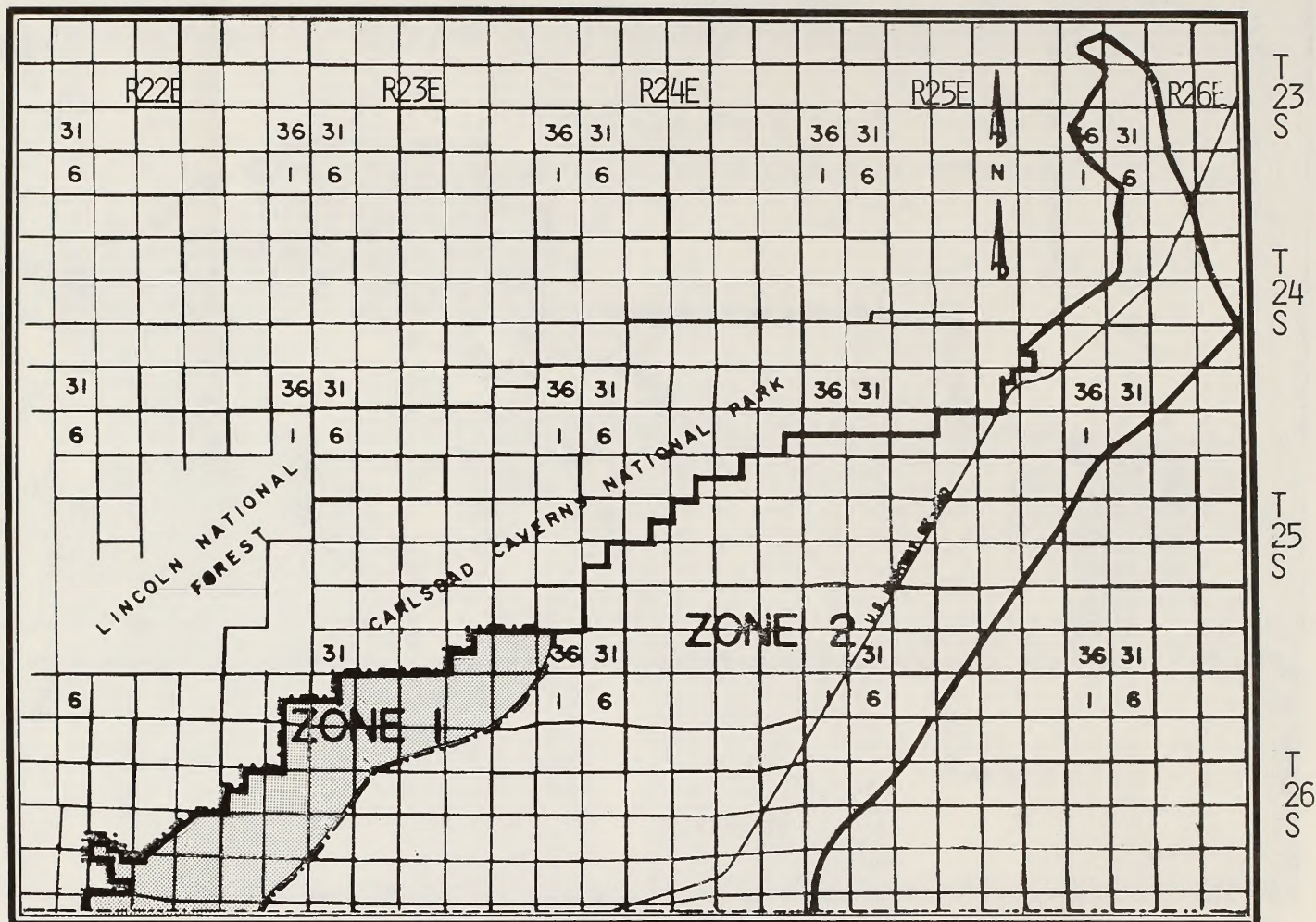
	ACEC BOUNDARY
	RNA BOUNDARY
	BLM
	STATE LAND
	PRIVATE
	NO SURFACE OCCUPANCY
	ORV CLOSURE
	LAND ACQUISITION
	MINERALS ACQUISITION

### MANAGEMENT PRESCRIPTION

	ACRES	
	RNA	ACEC
Restrict surface disturbance	(all)	5,190
No Surface Occupancy- oil & gas	2,320	1,780
Close to solid mineral leasing	2,320	1,780
Close to mineral location	2,320	1,780
Close to material disposal	(all)	5,190
Close to live stock grazing	2,320	-0-
Limit ORV to designated routes	2,280	1,655
ORV Closure	40	1,175
Limit fire suppression	(all)	5,190
Acquire non- federal lands	320	640
Acquire non- federal minerals	320	-0-
VRM Class II	2,320	1,780
VRM Class III	-0-	1,090



SMA No. 20 - GUADALUPE ESCARPMENT SCENIC AREA (64,380 acres)



0 1 2 3 4 5 6 miles  
SCALE

MAP LEGEND

— SCENIC AREA BOUNDARY

□ ZONE 1

▨ ZONE 2

MANAGEMENT PRESCRIPTION

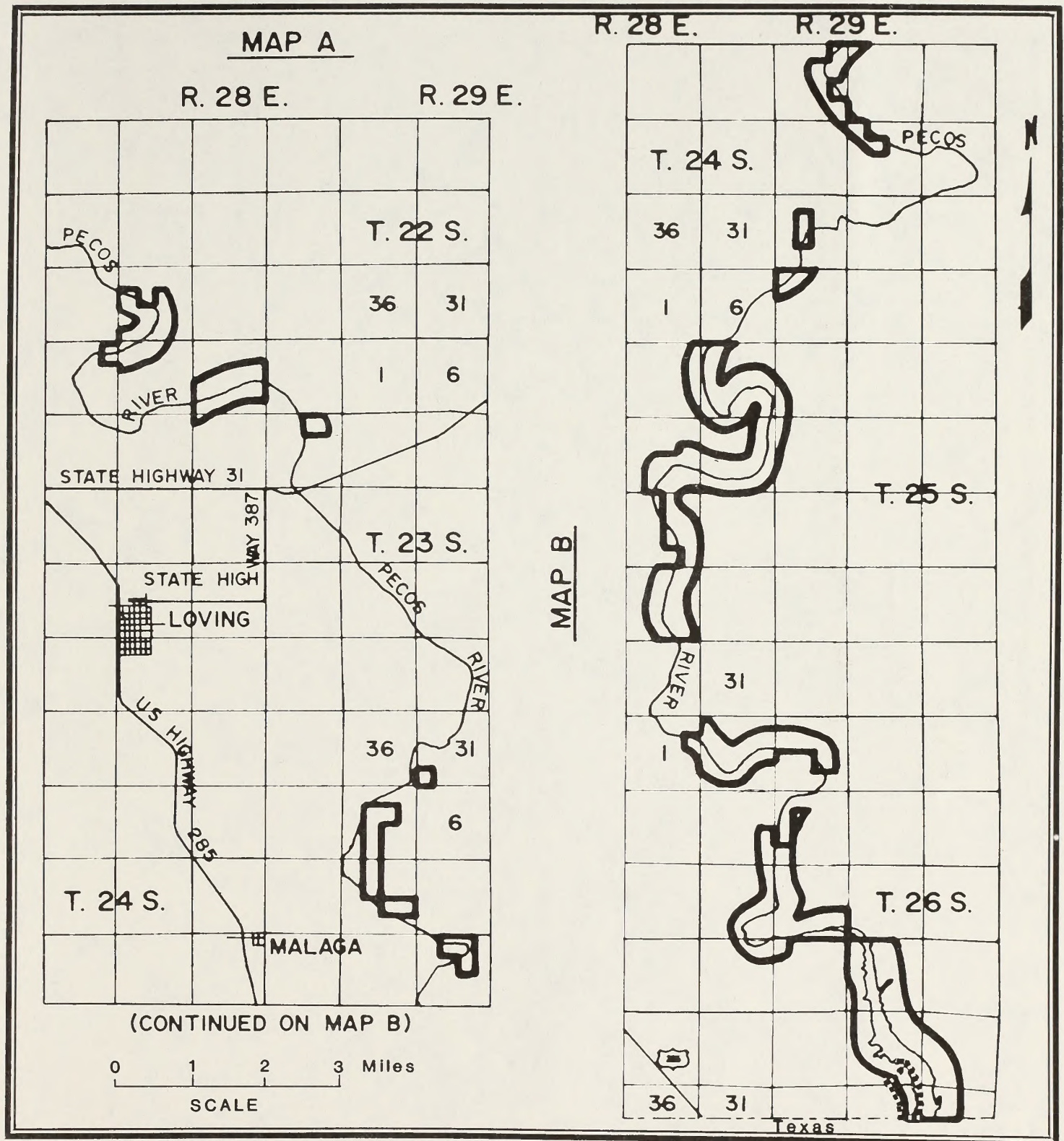
Zone 1

Restrict surface disturbance  
Special stipulation- oil and gas  
No Surface Occupancy-oil and gas  
Close to solid mineral leasing  
Close to mineral material sales  
Limit fire suppression  
Limit ORV use to designated routes  
Manage for VRM Class II objectives

Zone 2

Restrict surface disturbance  
Special stipulation- oil and gas  
Limit fire suppression  
Limit ORV use to designated routes  
Manage for VRM Class III objectives





MANAGEMENT PRESCRIPTION (Special Rec. Management Area- 6,000 acres)

Restrict surface disturbance  
 No Surface Occupancy- oil and gas  
 Close to solid minerals leasing  
 Close to mineral material disposal  
 Limit ORV use to designated routes

- Map A: 1,500 acres VRM Class III

MANAGEMENT PRESCRIPTION (Red Bluff Recreation Site only- 120 acres)

..... - Recreation Site Boundary  
 In addition to SRMA prescription:  
 Close to livestock grazing  
 Continue full fire suppression  
 (remaining 5,880 acres limited)

- Map B: 4,500 acres VRM Class II





# APPENDIX

F





REVISED APPENDIX F  
ROAD POLICY, STANDARDS AND IMPLEMENTATION PROCEDURES

A. INTRODUCTION

This appendix was prepared to describe, in general terms, the policy for future actions in the CRA that involve road construction, maintenance, rehabilitation and/or abandonment. Final policy will be developed based upon review and approval of this appendix.

There are thousands of miles of roads located on public lands within the CRA that are subject to BLM jurisdiction. As a general rule, these road systems are adequately designed and maintained to serve their intended purpose. However, there are many roads which have been improperly constructed and maintained that contribute to erosion. Also, in oil development areas there is a proliferation of roads, with many routes providing access to the same area of land. Usually, these roads were constructed for exploratory purposes and were not obliterated when they were no longer needed.

B. ROAD STANDARDS AND IMPLEMENTATION PROCEDURES

Road standards and implementation procedures described in this section will be in accordance with engineering standards further described in Section C.

Although most recent road construction and/or improvement activity in the CRA relates to mineral development, these road standards were developed to apply to all resource development, management, and protection related activities.

Implementation of road standards will involve the following steps for existing roads:

1. Inventory including identification of roads that do not meet Bureau Manual 9113 standards;
2. Functional classification of existing roads that would comprise a logical transportation network for public land management;
3. Contact with resource users to determine which roads are needed;
4. Assign road maintenance or rehabilitation responsibility to BLM or other parties, where appropriate;
5. Initiate appropriate action to begin bringing substandard roads to Bureau standards and specification;
6. Abandon and reclaim unneeded roads.

All new roads constructed in the CRA will be formally authorized, constructed and maintained in accordance with the BLM Manual 9113 and road standards described in this final policy. New road development standards will be implemented as follows:

1. Applications for new construction must contain adequate information to enable BLM to determine proposed location and assign a functional classification;



2. Adjudication of application, which includes environmental analysis preparation, comparison with RMP decisions to determine plan compliance and determine if reroutes are needed;
3. Authorization, which includes standards and/or specifications for the design and construction of the road(s), assignment of maintenance responsibility and future reclamation requirements that apply when the road is abandoned, or denial of application.

The following extract from BLM Manual 9113 explains the purpose of functional classification of road systems, which will be implemented by BLM in the CRA:

FUNCTIONAL CLASSIFICATION. The method and terminology recommended by the National Highway Functional Classification Study of 1968 provides guidelines for classifying Bureau roads. The Bureau has added resource roads as a category in addition to those identified in the 1968 study (as recommended by an interagency task group study on low-volume road standards, 1976-77). As Bureau roads are predominately low volume and are generally extensions of, or connectors to State or county systems, an "arterial" category does not apply to Bureau roads. Bureau roads are classified as follows:

1. Collector Roads. These roads normally provide primary access to large blocks of land, and connect with or are extensions of a public road system. Collector roads accommodate mixed traffic and serve many uses. They generally receive the highest volume of traffic of all the roads in the Bureau road system. User cost, safety, comfort, and travel time are primary road management considerations. Collector roads usually require application of the highest standards used by the Bureau. As a result, they have the potential for creating substantial environmental impacts and often require complex mitigation procedures.
2. Local Roads. These roads normally serve a smaller area than collectors, and connect to collectors or public road systems. Local roads receive lower volumes, carry fewer traffic types, and generally serve fewer uses. User cost, comfort, and travel time are secondary to construction and maintenance cost considerations. Low volume local roads in mountainous terrain, where operating speed is reduced by effort of terrain, may be single lane roads with turnouts. Environmental impacts are reduced as steeper grades, sharper curves, and lower design speed that would be permissible on collector roads are allowable.
3. Resource Roads. These roads normally are spur roads that provide point access and connect to local or collector roads. They carry very low volume and accommodate only one or two types of use. Use restrictions are applied to prevent conflicts between users needing the road and users attracted to the road. The location and design of these roads are governed by environmental compatibility and minimizing Bureau costs, with minimal consideration for user cost, comfort, or travel time.

BLM road policy in BLM Manual 9113 states that road standards may be modified to meet local situations. The major modifications which have been incorporated in these local standards are: (1) design by a professional engineer will only be required for high standard (collector) roads or



construction in mountainous or steep terrain; (2) establishment of local policies regarding temporary and primitive subclass roads within the "resource" functional classification, and (3) the Area Manager may authorize vehicles to drive across country without blading or use primitive roads in dry weather. In some cases there may be minor blading of brush required with the blade three to four inches above natural ground line. This is a temporary type road with intermittent or one-time access. If it is closed after use, water bars and other drainage will be constructed. Primitive roads are existing two-track roads that are created by vehicle traffic for which there are not any engineering standards. In all cases, drainage control will be required to prevent erosion.

### C. ROAD STANDARDS

The minimum standard (See Table F-1) for the Roswell District is a 14-foot travelway width for single-lane roads and a 24-foot travelway width for double-lane roads. Single-lane roads require turnouts. The maximum allowable sustained grade is 10 percent. Steeper grades must have a complete engineering analysis. Numbers of vehicles and/or vehicle types may be used to determine design standards (See Figure 1, DEIS Appendix F).

#### TURNOUTS

Turnouts must be provided on all one-lane roads which carry two-way traffic. Traffic safety requires that these turnouts be visible between each other and located on all blind horizontal and vertical curves and supplemented as necessary so that the maximum distance between turnouts is no more than 1,000 feet. For more heavily used or higher speed roads, the maximum distance between turnouts is reduced to 500 feet.

Turnouts must be a minimum of 10 feet wide for a length of 100 feet with a 25-foot taper on each end. There is more advantage in an increased number of turnouts than in making them excessively long. This applies unless overwidth and extra length vehicles are to be provided for, in which case the width and length is adjusted accordingly. The full width portion of turnouts is of sufficient length to accommodate at least one unit of the longest vehicle likely to use the road.

#### DRAINAGE

Drainage control shall be ensured over the entire road through the use of drainage dips, outsloping, insloping, natural rolling topography, ditch turnouts, or culverts (See Figures 3 and 4 of the DEIS Appendix F). Spacing of dips, waterbars, and turnout ditches will vary from 50 feet to 200 feet depending on class, cross slope, road grade and soil type.

Drainage Dip (waterbar) Construction: Drainage dips are to be an integral part of almost all resource and short-term roads. They are, in most cases, the least expensive and most effective method of road drainage. Drainage dips can be constructed for any road cross-section (i.e. insloped, outsloped, crowned, etc.). Drainage and road location are the most important aspects of any road (See Figure 5, DEIS Appendix F).

#### CULVERTS

Culvert pipes are to be used for cross drains on grades in excess of ten percent gradient.



Table F-1  
Minimum Road Design Standards - Resource Class Road 1/

	<u>Single Lane</u>	<u>Double Lane</u>
Width - Travel way width	14' (with turnouts)	24
Average Design Speed	15-25 m.p.h.	25-35 m.p.h.
Maximum Grade	10% *	10% *
Vertical Curve (Max)	see note No. 1	see note No. 1
Minimum Horizontal Curve Radius (feet)	65' for 15 m.p.h. 100' for 25 m.p.h.	100' for 25 m.p.h. 100' with curve widening for 35 m.p.h. (See Figure 1)
Cut Slope (back slope)		
Normal, minimum	2:1	2:1
Fill (down) Slope		
Normal, minimum	2:1	2:1
Ditch (one foot deep)		
Normal, minimum	4:1	4:1
Drainage control -		
Drainage dip (water bar) spacing	see Figure 5	see Figure 5
Culvert spacing	see Figure 7	see Figure 7
Drainage turnout spacing	same as culvert spacing	same as culvert spacing

\*Any grade above 10 percent requires a complete engineering analysis and Area Manager approval except for "pitch grades" (i.e., 8-10 percent grades that are 300 feet or less in length, followed by much flatter grades).

Note 1 - Vertical curve design is not required unless the road by its location or length will probably develop into a "Local" class. This determination and requirement is determined by the Area Manager.

1/ See Typical Road Section in Figure 2, DEIS Appendix F.

Roadbed culverts would be used to drain inside road ditches when drainage dips are not feasible.

All culvert sizing must be in accordance with accepted engineering practices (i.e. Talbot chart, etc.). The minimum size culverts in any installation must be 18 inches. Drainage crossing culverts should be designed for 10-year frequency or greater storm. Figures 6 and 7 (DEIS Appendix F) illustrate proper culvert installation.



Fisheries requirements will necessitate a more detailed design as specified by the surface management agency.

## ROAD SURFACE STANDARDS

### Travel Way

1. Surfacing with caliche and/or gravel would be required where all weather access is needed, if the natural soil does not have the bearing capacity for heavy vehicles in both wet and dry weather.
2. The roadbed should be smooth, free of ruts, chuckholes, rocks, slides, washboards, crowned and/or sloped for drainage.
3. The roadbed should be free from excessive accumulation of dust pockets or layers which are a driving hazard or public nuisance.
4. Berms must be absent along the shoulder.
5. Soft spots, such as those resulting from uncompacted earth, springs, and seeps, must be absent.

### CATTLEGUARDS (See Figure 8, DEIS Appendix F)

1. All cattleguard grid designs and foundation designs shall meet AASHTO Load Rating H-20, although AASHTO U-80 is preferred where over-weight loads are anticipated.
2. All cattleguard grid width shall meet or exceed the travel path of not less than 14 feet.
3. The approach ramp shall be not less than 50 feet on each side with smooth transition.
4. Provide a wire gate (16 foot minimum) on one side of the cattleguard.

### ROAD ALIGNMENT

The location which results in the least soil disturbance, with the lightest cuts and fills, is the best location from the standpoint of erosion control as well as grading costs.

A ridge crest route offers the advantages of light excavation, good drainage, and few culverts. The profile and alignment along ridge tops usually cause adverse grades, and the possibility of making them momentum grades is lessened.

Drainage bottoms usually have favorable grades, but they have several disadvantages. Quite often the bottoms are narrow and require extensive sidehill cuts; the side drainages are larger requiring larger culverts and greater fills, and the possibility of erosion is increased.

Alignment on the hillsides usually follows the grade on the contours around ridges and draws. This makes the road longer. Excavations are heavier as the side hill gets steeper and the higher cut banks expose more soil to erosion. Drainages on sidehill alignment can usually be crossed with fills and culverts.



## ROAD GRADES

Grades should not exceed those shown in Table F-1 unless a complete engineering analysis is made of the primary and alternate routes. Steeper grades may be allowed for short distances with approval of the Area Manager. Pitched grades, defined as comparatively short sections of unusually steep grades, are introduced for economic reasons. When used, they are compensated by flatter and more suitable grades in other sections. Although normally pitched grades are not desirable, they are acceptable and are recognized as good engineering when economically justified and properly designed. Bear in mind that the erosive effect of water increases with the increase in gradient.

## ACCESS ROADS

The following information and sample drawings (Figure 9, DEIS Appendix F) illustrate a hypothetical access road built in steep, rough, or unstable terrain or with special environmental problem/concerns.

Engineering design, slope staking and carefully controlled construction are all necessary in this case. Under less severe conditions, some requirements may not be necessary. Operators and consultants should contact the Chief, Branch of Surface Protection in the appropriate BLM Area Office for guidance relating to specific cases.

### 1. Planned Access Roads

In general, preliminary engineering plans (of the type shown in Figure 9) will be required for access roads proposed under the following conditions:

Where the part (more than 20%) of a majority of the roads profile and alignment consists of:

- Profile grade greater than 10%
- Side (cross) slopes greater than 25%
- Cuts or fills over 10 feet in height
- Terrain showing evidence of past landslides, sloughing, or severe erosion activity

### 2. Other requirements might be:

- a. Road design or under the direction of a registered professional engineer. Most roads in this type of terrain would become permanent which requires design by a registered Professional Engineer (See Bureau Manual 9113.42).
- b. Slope staking of road before ADP approval as required by Oil & Gas order No. 1.

## EROSION CONTROL

The areas disturbed from road construction such as cut slopes and embankment slopes will be subject to significant erosion due to loss of protective vegetation. This erosion is a major cause of plugged culverts and loss of drainage control, where installed. All disturbed areas not subject to routine maintenance must be revegetated to prevent loss of drainage control, sedimentation, and offsite erosion. The following areas will be seeded as directed by the BLM.



1. Cut slopes; from the bottom of the ditch to the top of the cut slope;
2. Embankment slopes; from the roadway shoulder to the toe of the embankment slope;
3. All "side cast" areas in full bench construction; and
4. In all borrow areas.

#### ROAD RECLAMATION

All roads determined by the BLM Authorized Officer, to no longer be needed will be reclaimed to approximate natural contours. Roads with significant cuts will have fill material placed back onto cut sections using care not to mix topsoils with base material.

Roads constructed on flat terrain will have the roadbeds ripped, scarified, and otherwise roughened as directed by the BLM to insure increased water infiltration and a properly prepared seedbed.

All road berms will be removed and recontoured and waterbreaks will be used on sloping surfaces as shown below.

<u>Grade</u>	<u>Spacing</u>
2%	200 ft.
2-4%	100 ft.
4-5%	75 ft.
+5%	50 ft.

The reclaimed areas will be seeded and/or fertilized as directed by the BLM to assure revegetation. Mulching and additional reseeding may be required until the disturbed areas are fully revegetated.





# APPENDIX

G





## REVISED APPENDIX G

### METHODOLOGY FOR DEVELOPING RANCH BUDGETS

The ranch budgets used for the Carlsbad RMP/EIS were developed using data from the BLM, CRA allotment case files, and from the New Mexico State University (NMSU) Agricultural Experiment Station Bulletin, "Organization, Costs, and Returns of Cattle Ranches in Southeastern New Mexico 1979" and the New Mexico Livestock Reporting Services.

The total operation for each livestock operator was estimated by grouping the AUMs by allotment for each operator in the three-county area. The 5-year average was used for BLM AUMs since it was determined that this best represented the operator's actual operation. It was assumed that the AUMs for State and private lands as shown in the allotment case files were indicative of the actual operation. The total AUMs were then converted into AUs. The operations were classified into different ranch sizes according to the number of AUs. The different categories were small 0-199 AUs, medium 200-499 AUs, and large 500+ AUs. After the operations were categorized, the average number of AUs for each ranch size was calculated by dividing the number of AU's by the number of operators. Those operators who had Section 15 leases only were excluded from the totals since there was insufficient information to determine the total operation.

The Carlsbad Input-Output Model was prepared by Regional Analytics, Santa Barbara, California, under contract with BLM. The following discussion is a summation of the methodology used by Regional Analytics. The details of the methodology used is contained in Technical Report X, which is available for review at the CRA. The study area contains the entire CRA in southeastern New Mexico which includes Eddy, Otero, and Chaves Counties.

Regional Analytics used five steps in creating the national input-output table from a commodity-by-industry format, in which it is originally published, to an industry-by-industry form required for regionalization. This conversion is needed because the regionalization is accomplished using regional employment data which are collected and reported on an industry, rather than commodity basis. The second step is the collection of employment data using published sources. The third step involves using the regional employment estimates to calculate location quotients, and with these location quotients, to scale down the national table to a regional table. The fourth step is the estimation of coefficients for special sectors that cannot be estimated from the national table directly. The fifth step involves calculating the transactions table, and balancing it.

TABLE G-1  
SMALL COMMERCIAL COW-CALF RANCH (Average of 65 AU) ESTIMATED RECEIPTS,  
COSTS AND NET RETURNS in the Carlsbad Resource Area, 1984

*****					
ITEM	NUMBER PER RANCH	AVERAGE WEIGHT (CWT)	PRICE PER CWT	VALUE PER HEAD	RECEIPTS
[----- (Dollars) -----]					
<u>CASH RECEIPTS</u>					
CATTLE					
Cows	11	7.800	40.65		3487.77
Yearling Heifers 1-2					
Yearling Steers 1-2	1	6.000	61.90		371.40
Heifer Calves	9	3.480	62.93		1970.96
Steer Calves	19	3.880	72.26		5327.01
Bulls	1	13.000	51.20		665.60
SUBTOTAL . . . . .	41				11822.74
<u>NON-CASH RECEIPTS</u>					
LIVESTOCK INVENTORY CHANGE					
Cows					
Yearling Heifers 1-2	1			363.53	363.53
Yearling Steers 1-2					
Heifer Calves	-2			273.86	-547.72
Steer Calves	-1			272.36	272.36
Bulls					
SUBTOTAL . . . . .	2				-456.55
LIVESTOCK PERQUISITES					
Steer Calves	1	3.880	72.26		280.37
TOTAL RECEIPTS					11696.56
*****					
ITEM	PURCHASED INPUTS	FUEL & REPAIRS	REPAIR & MAINTENANCE	DEPRECIATION	TOTAL
[----- (Dollars) -----]					
<u>COSTS</u>					
FEED:	2665.61				2665.61
LEASES AND GRAZING FEES:	1330.76				1330.76
LIVESTOCK EXPENSES:	1937.82				1937.82
LABOR (HIRED):	147.00				147.00
OTHER:	1965.74				1965.74
MACHINERY AND EQUIPMENT		1964.63		1229.99	3194.62
IMPROVEMENTS:			729.43	1924.04	2653.47
TOTAL COSTS	8046.93	1964.63	729.43	3154.03	13895.02
-----					
RETURNS TO OPERATOR LABOR, MANAGEMENT, AND CAPITAL					-2248.46
*****					



TABLE G-2

MEDIUM COMMERCIAL COW-CALF RANCH (Average of 269 AU) ESTIMATED RECEIPTS,  
COSTS AND NET RETURNS in the Carlsbad Resource Area, 1984

*****						
ITEM	NUMBER PER RANCH	AVERAGE WEIGHT (CWT)	PRICE PER CWT	VALUE PER HEAD	RECEIPTS	
			[----- (Dollars) -----]			
<u>CASH RECEIPTS</u>						
CATTLE						
Cows	39	8.000	40.65			12682.80
Yearling Heifers 1-2	2	5.800	57.48			666.77
Yearling Steers 1-2	15	6.200	61.90			5756.70
Heifer Calves	43	3.580	62.93			9687.44
Steer Calves	76	3.980	72.26			21857.20
Bulls	3	14.000	51.20			2150.40
<hr/>						
SUBTOTAL. . . . .	178					52801.31
<hr/>						
<u>NON-CASH RECEIPTS</u>						
LIVESTOCK INVENTORY CHANGE						
Cows	-6			451.66		-2709.96
Yearling Heifers 1-2	2			414.51		829.02
Yearling Steers 1-2	-1			388.10		-388.10
Heifer Calves	5			279.68		1398.40
Steer Calves	-1			277.92		-277.92
Bulls	-1			1068.51		-1068.51
<hr/>						
SUBTOTAL. . . . .	-2					-2217.07
<hr/>						
LIVESTOCK PERQUISITES						
Steer Calves	1	6.200	61.90			383.78
<hr/>						
TOTAL RECEIPTS						50968.02
<hr/>						
*****						
ITEM	PURCHASED INPUTS	FUEL & REPAIRS	REPAIR & MAINTENANCE	DEPRECI- ATION	TOTAL	
			[----- (Dollars) -----]			
<u>COSTS</u>						
FEED:	14142.20					14142.20
LEASES AND GRAZING FEES:	4880.52					4880.52
LIVESTOCK EXPENSES:	4167.07					4167.07
LABOR (HIRED):	1392.00					1392.00
OTHER:	5481.23					5481.23
MACHINERY AND EQUIPMENT		3617.98		2975.40	6593.38	
IMPROVEMENTS:			2431.76	5615.31	8047.07	
<hr/>						
<hr/>						
TOTAL COSTS	30063.02	3617.78	2431.76	8590.71	44703.47	
<hr/>						
<hr/>						
RETURNS TO OPERATOR LABOR, MANAGEMENT, AND CAPITAL						6264.55



TABLE G-3  
LARGE COMMERCIAL COW-CALF RANCH (Average of 674 AU) ESTIMATED RECEIPTS,  
COSTS AND NET RETURNS in the Carlsbad Resource Area, 1984

*****					
ITEM	NUMBER PER RANCH	AVERAGE WEIGHT (CWT)	PRICE PER CWT [----- (Dollars) -----]	VALUE PER HEAD	RECEIPTS
<u>CASH RECEIPTS</u>					
CATTLE					
Cows	80	8.000	40.65		26016.00
Yearling Heifers 1-2	20	5.800	57.48		6667.68
Yearling Steers 1-2	122	6.200	61.90		46821.16
Heifer Calves	84	3.580	62.93		18924.31
Steer Calves	90	3.980	72.26		25883.53
Bulls	2	14.000	51.20		1433.60
SUBTOTAL . . . . .	398				125746.28
<u>NON-CASH RECEIPTS</u>					
LIVESTOCK INVENTORY CHANGE					
Cows	4			451.66	1806.64
Yearling Heifers 1-2	2			414.51	829.02
Yearling Steers 1-2	2			388.10	776.20
Heifer Calves	5			279.68	1398.40
Steer Calves	-9			277.92	-2501.28
Bulls	1			1068.51	1068.51
SUBTOTAL . . . . .	5				3377.49
LIVESTOCK PERQUISITES					
Steer Calves	1	6.200		61.90	383.78
Heifer Calves	1	3.580		62.93	225.28
SUBTOTAL . . . . .	2				609.06
TOTAL RECEIPTS					129732.83
*****					
ITEM	PURCHASED INPUTS	FUEL & REPAIRS	REPAIR & MAINTENANCE	DEPRECI- ATION	TOTAL
[----- (Dollars) -----]					
<u>COSTS</u>					
FEED:	30129.96				30129.96
LEASES AND GRAZING FEES:	10477.02				10477.02
LIVESTOCK EXPENSES:	7553.65				7553.65
LABOR (HIRED):	11970.00				11970.00
OTHER:	10382.47				10382.47
MACHINERY AND EQUIPMENT:		9094.00		9497.00	18591.00
IMPROVEMENTS:			7228.54	21902.38	29130.92
TOTAL COSTS	70513.10	9094.00	7228.54	31399.38	118235.02
RETURNS TO OPERATOR LABOR, MANAGEMENT, AND CAPITAL					11497.81
*****					



TABLE G-4  
SMALL COMMERCIAL COW-CALF/SHEEP RANCH (Average of 167 AU) ESTIMATED RECEIPTS,  
COSTS AND NET RETURNS in the Carlsbad Resource Area, 1984

*****					
ITEM	NUMBER PER RANCH	AVERAGE WEIGHT (CWT)	PRICE PER CWT	VALUE PER HEAD	RECEIPTS
[----- (Dollars) -----]					
<u>CASH RECEIPTS</u>					
SHEEP					
Ewes, Aged	46	1.200	16.29		899.21
Ewes, Young	14	1.320	33.19		613.35
Lambs	268	.770	48.67		10043.54
Wethers	1	1.200	45.38		54.46
Bucks	1	1.400	45.38		63.53
SUBTOTAL . . . . .	330				11674.09
WOOL AND WOOL INCENTIVE PAYMENTS					8969.22
<u>CATTLE</u>					
Cows	6	7.810	40.65		1904.86
Yearling Heifers 1-2	1	6.000	57.48		344.88
Yearling Steers 1-2	1	6.200	61.90		383.78
Heifer Calves	9	3.48	62.93		1970.97
Steer Calves	15	3.880	76.44		4448.81
Bulls	1	13.000	47.17		613.21
SUBTOTAL . . . . .	33				9666.51
<u>NON-CASH RECEIPTS</u>					
<u>LIVESTOCK INVENTORY CHANGE</u>					
Ewes, Aged	28			17.14	479.92
Ewes, Young	12			60.85	730.20
Ewes, Yearling	15			60.85	912.75
Lambs	60			30.20	1812.00
Wethers	4			126.45	505.80
Bucks					
Cows					
Yearling Heifers 1-2	-1			451.66	-451.66
Yearling Steers 1-2					
Heifer Calves	-1			279.68	-279.68
SUBTOTAL . . . . .	117				3709.33
<u>LIVESTOCK PERQUISITES</u>					
Lambs	1	.770	48.60		37.42
Wethers	1	1.200	45.38		54.46
Steer Calves	1	3.880	76.44		296.59
SUBTOTAL . . . . .	3				388.47
TOTAL RECEIPTS					34407.62
*****					
ITEM	PURCHASED INPUTS	FUEL & REPAIRS	REPAIR & MAINTENANCE	DEPRECIATION	TOTAL
[----- (Dollars) -----]					
<u>COSTS</u>					
FEED:	2134.96				2134.96
LEASES AND GRAZING FEES:	3455.81				3455.81
LIVESTOCK EXPENSES:	2301.60				2301.60
LABOR (HIRED):	1853.50				1853.50
OTHER:	5538.32				5538.32
MACHINERY AND EQUIPMENT:		1129.44		689.60	1819.04
IMPROVEMENTS:			1625.16	6155.58	7780.74
TOTAL COSTS	15284.19	1129.44	1625.16	6845.18	24883.97
RETURNS TO OPERATOR LABOR, MANAGEMENT, AND CAPITAL					9523.65



TABLE G-5  
MEDIUM COMMERCIAL COW-CALF/SHEEP RANCH (Average of 367 AU) ESTIMATED RECEIPTS,  
COSTS AND NET RETURNS in the Carlsbad Resource Area, 1984

*****					
ITEM	NUMBER PER RANCH	AVERAGE WEIGHT	PRICE PER CWT	VALUE PER HEAD	RECEIPTS
[----- (Dollars) -----]					
<b>CASH RECEIPTS</b>					
SHEEP					
Ewes, Aged	101	1.200	16.29		1974.35
Ewes, Young	31	1.320	33.14		1356.09
Lambs	596	.770	48.60		22303.51
Wethers	3	1.200	45.38		163.37
Bucks	2	1.400	45.58		127.62
SUBTOTAL . . . . .	733				25924.94
<b>WOOL AND WOOL INCENTIVE PAYMENTS</b>					
					19806.64
<b>CATTLE</b>					
Cows	14	8.000	40.65		4552.80
Yearling Heifers 1-2	3	5.800	57.48		1000.15
Yearling Steers 1-2	2	6.200	61.90		767.56
Heifer Calves	19	3.580	62.93		4280.50
Steer Calves	33	3.980	72.26		9490.63
Bulls	1	14.000	51.20		716.80
SUBTOTAL . . . . .	72				20808.44
<b>NON-CASH RECEIPTS</b>					
<b>LIVESTOCK INVENTORY CHANGE</b>					
Ewes, Aged	17			17.14	291.38
Ewes, Young	7			60.85	425.95
Ewes, Yearling	9			60.85	547.65
Lambs	37			30.20	1117.40
Wethers	2			126.45	252.90
Bucks	1			70.25	70.25
Cows	-3			414.51	-1243.53
Yearling Heifers 1-2	-1			408.99	-408.99
Yearling Steers 1-2	-1			383.19	-383.19
Heifer Calves	-1			279.68	-279.68
SUBTOTAL . . . . .	67				390.14
<b>LIVESTOCK PERQUISITES</b>					
Lambs	2	.770	48.60		74.84
Wethers	3	1.200	45.38		163.37
Steer Calves	1	4.300	72.26		310.72
SUBTOTAL . . . . .	6				548.93
<b>TOTAL RECEIPTS</b>					<b>67479.09</b>
*****					
ITEM	PURCHASED INPUTS	FUEL & REPAIRS	REPAIR & MAINTENANCE	DEPRECIATION	TOTAL
[----- (Dollars) -----]					
<b>COSTS</b>					
FEED:	4683.25				4683.25
LEASES AND GRAZING FEES:	6609.36				6609.36
LIVESTOCK EXPENSES:	3380.72				3380.72
LABOR (HIRED):	12384.50				12384.50
OTHER:	8363.99				8363.99
MACHINERY AND EQUIPMENT:		3054.50		1948.00	5002.50
IMPROVEMENTS:			3521.61	13296.13	16817.74
<b>TOTAL COSTS</b>	<b>35421.82</b>	<b>3054.50</b>	<b>3521.61</b>	<b>15244.13</b>	<b>57242.06</b>
<b>RETURNS TO OPERATOR LABOR, MANAGEMENT, AND CAPITAL</b>					<b>10237.03</b>
*****					



TABLE G-6  
LARGE COMMERCIAL COW-CALF/SHEEP RANCH (Average of 830.5 AU) ESTIMATED RECEIPTS,  
COSTS AND NET RETURNS in the Carlsbad Resource Area, 1984

*****					
ITEM	NUMBER PER RANCH	AVERAGE WEIGHT	PRICE PER CWT	VALUE PER HEAD	RECEIPTS
[----- (Dollars) -----]					
<b>CASH RECEIPTS</b>					
SHEEP					
Ewes, Aged	229	1.200	16.29		4476.49
Ewes, Young	70	1.320	33.14		3062.14
Lambs	1347	.770	48.60		50407.43
Wethers	7	1.200	45.38		381.19
Bucks	4	1.400	45.38		254.13
SUBTOTAL . . . . .	1657				58580.89
WOOL AND WOOL INCENTIVE PAYMENTS					45062.15
<b>CATTLE</b>					
Cows	31	9.000	40.65		11341.35
Yearling Heifers 1-2	7	6.200	57.48		2494.63
Yearling Steers 1-2	6	6.500	61.90		2414.10
Heifer Calves	43	4.150	62.93		11229.86
Steer Calves	74	4.300	72.26		22993.13
Bulls	1	13.000	51.20		665.60
SUBTOTAL . . . . .	162				51138.67
<b>NON-CASH RECEIPTS</b>					
<b>LIVESTOCK INVENTORY CHANGE</b>					
Ewes, Aged	39			17.14	668.46
Ewes, Young	17			60.85	1034.45
Ewes, Yearling	21			60.85	1277.86
Lambs	84			30.20	2536.80
Wethers	6			126.45	758.70
Bucks	1			70.25	70.25
Cows	-7			414.51	-2901.57
Yearling Heifers 1-2	-1			408.99	-408.99
Yearling Steers 1-2	-1			383.19	-383.19
Heifer Calves	-1			279.68	-279.68
SUBTOTAL . . . . .	158				2373.08
<b>LIVESTOCK PERQUISITES</b>					
Lambs	4	.770	48.60		149.69
Wethers	7	1.200	45.38		381.19
Steer Calves	1	4.300	72.26		310.72
SUBTOTAL . . . . .	12				841.60
<b>TOTAL RECEIPTS</b>					157996.39
*****					
ITEM	PURCHASED INPUTS	FUEL & REPAIRS	REPAIR & MAINTENANCE	DEPRECIATION	TOTAL
[----- (Dollars) -----]					
<b>COSTS</b>					
FEED:	10619.11				10619.11
LEASES AND GRAZING FEES:	10989.66				10989.66
LIVESTOCK EXPENSES:	5760.96				5760.96
LABOR (HIRED):	16691.50				16691.50
OTHER:	13963.77				13963.77
MACHINERY AND EQUIPMENT:		6816.50		4361.00	11177.50
IMPROVEMENTS:			8133.57	30053.57	38187.14
<b>TOTAL COSTS</b>	58025.00	6816.50	8133.57	34414.57	107389.64
<b>RETURNS TO OPERATOR LABOR, MANAGEMENT, AND CAPITAL</b>					50606.75
-----					



TABLE G-7

## ESTIMATED SHORT TERM RECEIPTS, COSTS, AND RETURNS FOR ALTERNATIVE A

	Small	Cow Med.	Large	Small	Sheep Med.	Large	Total For All Ranches
Percent change	-0-	-0-	-0-	-0-	-0-	-0-	
Gross Income	11,646.56	50,968.02	129,732.83	34,407.62	67,479.09	157,996.39	4,981,926.45
Total Cash Costs	10,740.99	36,112.76	86,835.64	18,038.79	41,997.93	72,975.07	3,314,674.30
Returns Above Cash Costs	905.57	14,855.26	42,897.19	16,368.83	25,481.16	85,021.32	1,667,252.14
Depreciation	3,154.03	8,590.71	31,399.38	6,845.18	15,244.13	34,414.57	1,099,258.94
Returns to Operator Labor, Management, and Capital	-2,248.46	6,264.55	11,497.82	9,523.65	10,237.03	50,606.75	567,993.21
Herd Size (AU)	65.0	269	674.0	167.0	367.0	830.5	26,380.0

Source: BLM Files.

TABLE G-8

## ESTIMATED LONG-TERM RECEIPTS, COSTS, AND RETURNS FOR ALTERNATIVE A

	Small	Cow Med.	Large	Small	Sheep Med.	Large	Total For All Ranches
Percent change	+4.2	+13.31	+17.38	+5.26	+10.84	+9.31	
Gross Income	12,139.22	57,790.24	152,291.66	36,297.09	74,791.28	172,716.22	5,531,512.93
Total Cash Costs	10,779.08	40,949.86	101,931.63	18,988.34	46,551.35	79,768.27	3,640,216.97
Returns Above Cash Costs	1,360.14	17,093.38	50,360.03	17,308.75	28,239.93	92,947.95	1,897,114.96
Depreciation	3,154.03	8,590.71	31,399.38	6,845.18	15,244.13	34,414.57	1,099,258.94
Returns to Operator Labor, Management, and Capital	-1,793.89	8,502.67	18,960.65	10,463.57	12,995.80	58,533.38	797,856.02
Herd Size (AU)	67.7	302.1	791.1	175.7	406.7	907.8	29,260.4

Source: BLM Files.

TABLE G-9

## ESTIMATED SHORT-TERM RECEIPTS, COSTS, AND RETURNS FOR ALTERNATIVE B

	Small	Cow Med.	Large	Small	Sheep Med.	Large	Total For All Ranches
Gross Income	11,646.54	50,968.01	129,732.82	34,382.74	67,468.60	157,997.67	4,981,675.50
Total Cash Costs	10,342.09	36,112.69	86,835.64	18,038.79	41,997.93	72,975.07	3,283,096.29
Returns Above Cash Costs	1,304.45	14,855.32	42,897.18	16,343.95	25,470.67	85,022.60	1,698,579.21
Depreciation	3,154.03	8,590.71	31,399.38	6,845.18	15,244.13	34,414.57	1,099,258.94
Returns to Operator Labor, Management, and Capital	-1,849.58	6,264.61	11,497.80	9,498.77	10,226.54	50,783.03	599,320.27
Herd Size (AU)	65.0	266.5	674.0	167.0	367.0	830.5	26,380.0

Source: BLM Files.



TABLE G-10

## ESTIMATED LONG-TERM RECEIPTS, COSTS, AND RETURNS FOR ALTERNATIVE B

	Cow			Sheep			Total For All Ranches
	Small	Med.	Large	Small	Med.	Large	
Gross Income	12,691.67	58,516.93	154,062.48	36,482.93	77,677.63	175,436.63	5,647,814.11
Total Cash Costs	11,269.62	41,464.78	103,116.89	19,085.55	48,348.77	81,024.69	3,722,678.02
Returns Above Cash Costs	1,422.05	17,052.15	50,945.59	17,397.38	29,328.86	94,411.94	1,925,136.09
Depreciation	3,154.03	8,590.71*	31,399.38	6,845.18	15,244.13	34,414.57	1,099,258.94*
Returns to Operator Labor, Management, and Capital	-1,731.98	8,461.44	19,546.21	10,552.20	14,084.73	59,997.37	825,877.15*
Herd Size (AU)	70.8	306.0	800.3	176.6	422.5	922.1	29,892.1

Source: BLM Files.

TABLE G-11

## ESTIMATED SHORT-TERM RECEIPTS, COSTS, AND RETURNS FOR ALTERNATIVE C

	Cow			Sheep			Total For All Ranches
	Small	Med.	Large	Small	Med.	Large	
Gross Income	11,646.54	50,968.01	129,732.82	34,382.74	67,468.60	157,997.67	4,981,675.50
Total Cash Costs	10,342.09	36,112.69	86,835.64	18,038.79	41,997.93	72,975.07	3,284,356.29
Returns Above Cash Costs	1,304.45	14,855.32	42,897.18	16,343.95	25,470.67	85,022.60	1,697,319.21
Depreciation	3,154.03	8,590.71	31,399.38	6,845.18	15,244.13	34,414.57	1,099,258.94
Returns to Operator Labor, Management, and Capital	-1,849.58	6,264.61	11,497.80	9,498.77	10,226.54	50,608.03	598,060.27
Herd Size (AU)	65.0	266.5	674.0	167.0	367.0	830.5	26,380.0

Source: BLM Files.

TABLE G-12

## ESTIMATED LONG-TERM RECEIPTS, COSTS, AND RETURNS FOR ALTERNATIVE C

	Cow			Sheep			Total For All Ranches
	Small	Med.	Large	Small	Med.	Large	
Gross Income	12,255.68	57,541.64	152,253.16	35,987.40	74,717.62	172,716.16	5,531,580.56
Total Cash Costs	10,882.49	40,773.69	101,905.82	18,826.34	46,506.38	79,768.32	3,642,324.33
Returns Above Cash Costs	1,373.19	16,767.95	50,347.34	17,161.06	28,211.24	92,947.84	1,889,256.23
Depreciation	3,154.03	8,590.71	31,399.38	6,845.18	15,244.13	34,414.57	1,099,258.94
Returns to Operator Labor, Management, and Capital	-1,780.84	8,177.24	18,947.96	10,315.88	12,967.11	58,533.27	789,997.29
Herd Size (AU)	68.3	300.8	796.0	174.2	406.3	907.8	29,261.6

Source: BLM Files.



TABLE G-13

## ESTIMATED SHORT-TERM RECEIPTS, COSTS, AND RETURNS FOR ALTERNATIVE D

	Cow			Sheep			Total For All Ranches
	Small	Med.	Large	Small	Med.	Large	
Gross Income	11,574.80	51,995.91	131,407.37	29,524.92	57,821.57	138,606.69	4,766,343.52
Total Cash Costs	10,277.90	36,844.02	87,953.39	15,455.60	35,989.79	64,014.93	3,176,372.01
Returns Above Cash Costs	1,296.90	15,151.89	43,453.98	14,069.32	21,831.78	74,591.76	1,589,971.51
Depreciation	3,154.03	8,590.71	31,399.38	6,845.18	15,244.13	34,414.57	1,099,258.94
Returns to Operator Labor, Management, and Capital	-1,857.13	6,561.18	12,054.60	7,224.14	6,587.65	40,177.19	490,712.57
Herd Size (AU)	64.5	271.8	682.6	143.0	314.5	745.2	25,347.6

Source: BLM Files.

TABLE G-14

## ESTIMATED LONG-TERM RECEIPTS, COSTS, AND RETURNS FOR ALTERNATIVE D

	Cow			Sheep			Total For All Ranches
	Small	Med.	Large	Small	Med.	Large	
Gross Income	11,646.54	50,968.01	129,732.82	34,382.74	67,468.60	157,997.56	4,981,674.73
Total Cash Costs	10,342.09	36,112.69	86,835.64	18,038.79	41,997.93	72,975.07	3,284,356.29
Returns Above Cash Costs	1,304.45	14,855.32	42,897.18	16,343.95	25,470.67	85,022.49	1,697,318.44
Depreciation	3,154.03	8,590.71	31,399.38	6,845.18	15,244.13	34,414.57	1,099,258.94
Returns to Operator Labor, Management, and Capital	-1,849.58	6,264.61	11,497.80	9,498.77	10,226.54	50,607.92	598,059.50
Herd Size (AU)		266.5	674.0	167.0	367.0	830.5	26,380.0

Source: BLM Files.

TABLE G-15

## ESTIMATED RECEIPTS, COSTS, AND RETURNS FOR NO GRAZING ALTERNATIVE

	Cow			Sheep			Total 129 Ranches
	Small	Med.	Large	Small	Med.	Large	
Gross Income	4,711.82	20,315.16	73,162.35	8,774.81	25,187.72	74,116.02	2,192,383.37
Total Cash Costs	4,197.71	14,395.21	48,968.92	4,590.45	15,677.58	34,230.33	1,439,033.25
Returns Above Cash Costs	514.11	5,919.95	24,193.43	4,184.36	9,510.14	39,885.69	753,350.12
Depreciation	3,154.03	8,590.71	31,399.38	6,845.18	15,244.13	34,414.57	1,099,258.94
Returns to Operator Labor, Management, and Capital	-2,639.92	-2,670.76	-7,205.95	-2,660.82	-5,733.99	+5,471.12	-345,908.82
Herd Size (AU)	25.6	106.2	380.1	42.5	137.0	389.6	11,549.7

Source: BLM Files.



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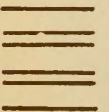
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